



## **PUBLIC DISCLOSURE**

July 13, 2015

### **COMMUNITY REINVESTMENT ACT PERFORMANCE EVALUATION**

Woodforest National Bank

Charter Number 16892

1330 Lake Robbins Drive  
The Woodlands, Texas 77380

Office of the Comptroller of the Currency

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

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## General Information and Overall CRA Rating

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 (LMI) neighborhoods, consistent with the 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 CRA performance issued by the OCC, the institution's supervisory agency, for the evaluation period ended July 13, 2015. 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 Rating:** This institution is rated Satisfactory.

The following table indicates the performance level of Woodforest National Bank with respect to the Lending, Investment, and Service Tests:

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

The major factors that support this rating include:

- Overall, an adequate level of lending, geographic distribution of loans and dispersion of loans to different income levels. Bank's performance in 15 of the 23 rating areas is adequate. Performance in other rating areas ranged from poor to good.
- Overall, an excellent level and responsiveness of Community Development (CD) investments were made in six of the 23 rating areas. However, these rating areas represent 94 percent of the bank's deposits and 61 percent of their branching network. The bank's investment performance in the vast majority of the other rating areas was either good or adequate.
- In the vast majority of the rating areas reviewed, the bank's delivery systems were at least reasonably accessible to geographies and individuals of different income levels in the bank's assessment areas (AAs). Performance in 14 of the rated areas was either good or adequate and these AAs represent 72 percent of the bank's branching network and 93 percent of their deposit base.

## Definitions and Common Abbreviations

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

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

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

**Census Tract (CT) – 2010 Census:** Small, relatively permanent statistical subdivisions of a county delineated by local participants as part of the U.S. Census Bureau's Participant Statistical Areas Program. The primary purpose of CTs is to provide a stable set of geographic units for the presentation of decennial census data. CTs generally have between 1,500 and 8,000 people, with an optimum size of 4,000 people.

**Community Development (CD):** 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 Small Business Administration's Development Company or Small Business Investment Company programs, size eligibility standards or have gross annual revenues of \$1 million or less; or, activities that revitalize or stabilize low- or moderate-income geographies, distressed or underserved nonmetropolitan middle-income geographies, or designated disaster areas; or loans, investments, and services that support, enable or facilitate projects or activities under HUD Neighborhood Stabilization Program criteria that benefit low-, moderate-, and middle-income individuals and geographies in the bank's assessment area(s) or outside the assessment area(s) provided the bank has adequately addressed the community development needs of its assessment area(s).

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

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

**Family:** Includes a householder and one or more other persons living in the same household who are related to the householder by birth, marriage, or adoption. The number of family households always equals the number of families; however, a family household may also include non-relatives living with the family.

Families are classified by type as either a married-couple family or other family, which is further classified into 'male householder' (a family with a male householder and no wife present) or 'female householder' (a family with a female householder and no husband present).

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

**Geography:** A census tract delineated by the United States Bureau of the Census in the most recent decennial census.

**Home Mortgage Disclosure Act (HMDA):** The statute that requires certain mortgage lenders that do business or have banking offices in a metropolitan statistical area to file annual summary reports of their mortgage lending activity. The reports include such data as the race, gender, and the income of applicants, the amount of loan requested, the disposition of the application (e.g., approved, denied, and withdrawn), loan pricing, the lien status of the collateral, any requests for preapproval and loans for manufactured housing.

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

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

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

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

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

**Median Family Income (MFI) – 2010 Census:** The median income derived from the United States Census Bureau's American Community Survey data every 5 years and used to determine the income level category of geographies. Also, it is the median income determined by the Federal Financial Institutions Examination Council (FFIEC) annually that is used to determine the income level of individuals within a geography. For any given geography, the median is the point at which half of the families have income above it and half below it.

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

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

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

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

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

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

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

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

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

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

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

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

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

## Description of Institution

Woodforest National Bank (WNB) is a \$4.4 billion interstate financial institution headquartered in The Woodlands, Montgomery County, Texas. WNB was founded in 1980 and has become one of the largest independently owned banks in the Houston-Sugar Land MSA.

WNB is located in 17 states, encompassing 211 AAs, including the states of Alabama, Florida, Georgia, Illinois, Indiana, Kentucky, Louisiana, Maryland, Mississippi, New York, North Carolina, Ohio, Pennsylvania, South Carolina, Texas, Virginia and West Virginia and the six multistate AAs of Charlotte, North Carolina-South Carolina; Chicago, Illinois-Indiana; Myrtle Beach North Carolina-South Carolina; Louisville, Kentucky-Indiana; Cincinnati, Ohio-Kentucky-Indiana; and Washington D.C.-Virginia-Maryland. WNB operates 749 banking offices throughout its AAs.

The bank's primary market area is Texas where the bank has 86 percent of its deposits and operates 203 branches, of which 37 branches are traditional brick and mortar offices. Texas is the only state where WNB currently has traditional branches. Branch offices in the other states are located primarily in Wal-Mart or other retail stores and are referred to in this Performance Evaluation as "in-store" branches. Within Texas, the Houston Metropolitan Area is the bank's primary market area with 91 percent of the state's deposits and 105 banking offices, including 35 offices that are traditional brick and mortar branches.

Competition in most of the major markets is provided by larger institutions such as Bank of America, N.A., Wells Fargo, N.A., Fifth Third Bank, JP Morgan Chase Bank, N.A., and BMO Harris Bank.

The bank's primary business strategy is to expand through non-traditional branching in retail stores. This strategy is largely dependent on an agreement with Wal-Mart to open banking offices in new Wal-Mart store locations. The Wal-Mart branches are not staffed with loan officers, although loan applicants can apply for loans through a kiosk system in the branch. Customers desiring a commercial loan are referred to a central business loan center for processing. The bank is a Small Business Administration (SBA) Preferred Lender enabling the bank to originate SBA loans with a simplified application and approval process.

In May 2013, WNB began offering an unsecured and a secured consumer loan product, ReLi. ReLi is a revolving line of credit directly tied to the customer's checking account. Customers can be approved for an unsecured line from \$500 up to \$2,500 and up to \$5,000 for a secured line. Funds can be used by the consumer for any purpose and can be accessed through their checking account. The ReLi product was developed as an alternative to pay day loans and also meets the small dollar loan product needs of many consumers. The ReLi product also offers customers an opportunity to rebuild their credit as their performance on the line is reported to the credit bureaus.

When introduced, the interest rate was 11.99 percent but the rate was increased to 15.99 percent in January 2015. The product also provides overdraft protection, as advances are automatic and cover checks, Automated Clearing House (ACH) and debit card amounts that exceed the customer's account balance. Therefore, the customer does not incur an overdraft fee. ReLi customers pay a minimum monthly payment of \$25 or 5 percent of the outstanding balance whichever is greater.



Payments can be made at any branch location or by electronic funds transfer and any payment not received by the due date are automatically debited from the customer's account. Loan applications are available online, at the kiosks or at traditional banking offices. The product is underwritten and centrally processed at the bank's Consumer Loan Center in The Woodlands. The ReLi loans are included in this PE as consumer loans.

While WNB does offer small loans to businesses and farms in all markets, the bank does not make a significant number of these type loans in any market other than Texas. In 2014, WNB decided to no longer offer home purchase loan products. WNB established an agreement with Quicken Loans (Quicken) where Woodforest customers are referred to Quicken for these types of loans. Presently, the bank's primary loan strategy is to purchase HMDA reportable loans. Recent loan purchases have focused on refinance loans but also can include home purchase and home improvement loans. WNB has established relationships with several financial institutions and other lenders to purchase these loans.

In 2014, the bank also created the Community Development Dollars loan product. The product is an unsecured line of credit and is only offered to organizations that meet the Community Development definition. Loan amounts range from \$1,000 to \$5,000 and are provided as short-term funding for operational expenses or temporary working capital. Since inception, the bank has made 24 loans totaling \$102,000.

In 2014, WNB opened Loan Production Offices (LPOs) in the Charlotte and Richmond MSAs. The bank then opened three more LPOs in 2015 in the Cincinnati, Pittsburgh and Indianapolis MSAs. The LPOs are staffed with three Community Development lenders (CDLs) and their primary function is to identify new CD loan opportunities for the bank.

Late 2013, the bank created three new commercial loan products: Business ReLi, Small Business Preferred and Woodforest Merchant Select. The loan products were designed to meet the short-term cash needs, business growth, expansion and unexpected expenses of small businesses.

WNB is a wholly-owned subsidiary of Woodforest Financial Group (WFG), which is also headquartered in The Woodlands. The WFG had assets of \$4.55 billion as of December 2014 and WNB represented 99 percent of WFG's assets. In addition to the bank, WFG also owns three non-bank subsidiaries including Woodforest Financial Services Inc. (WFS), Woodforest Leasing, Inc. (WFL) and Par Real Estate Holdings II LLC (Par II). WFS provide non-deposit investment products such as mutual funds and annuities and provide comprehensive employee benefit plans to small- and medium-sized businesses. WLI provides capital and operating leases on leasehold improvements and equipment to WNB. Par II is a real estate asset holding company. The activities of these affiliates were not considered in this Performance Evaluation as they had no CRA impact nor did the activities of these subsidiaries hamper the bank's ability to meet the credit needs of the community.

As of June 30, 2015, the bank's loan mix was as follows: construction and land development 14.99 percent, 1-4 family residential 44.86 percent, nonfarm nonresidential 24.13 percent, commercial and industrial 9.95 percent, individual 1.70 percent and all other 6.07 percent. As mentioned previously, the bank's current strategy is to not offer home purchase loans. Total loans were \$2.3 billion and represented 51 percent of total assets. The bank's equity capital was \$387 million. WNB's loan-to-deposit ratio as of June 30, 2015, was 57.44 percent.

Alternative Delivery Systems

WNB offers expanded availability of banking services by providing free online banking and telephonic phone services; including interactive voice response systems, call centers and mobile phone banking. The bank offers a full suite of electronic banking services to include free online banking that provides access to bill pay, transfers, statements, available balances, images of checks, mobile deposits and the ability to receive electronic statements and daily or weekly email notifications of account balances, pending and posted transactions and fees.

Additionally, WNB offers Western Union money services and credit cards through a third party. The bank also offers a low-cost checking product that features unlimited transactions with an opening deposit of \$25 dollars. This account does not have a monthly service charge if the account has a direct deposit or if a minimum balance, greater than \$100 dollars is maintained. The bank has an array of deposit products. One of the products is the bank's "Second Chance Checking" product. The product allows individuals who have experienced previous banking troubles a way to gain access back into the banking system.

Branch Hours of Operation

The bank's business hours and services do not vary in a way that inconveniences low- or moderate-income geographies or individuals. All in-store branches are open 7-days a week and the hours of operation vary, with opening times between 8 and 10 am to closing times between 4 and 6 pm, Monday through Friday. Saturday banking hours vary from 9 or 10 am until 4 or 6 pm. Banking hours on Sunday vary from 11 am until noon with closing hours between 4 or 5 pm. In the Houston AA, WNB has five branches in Wal-Mart stores that are open seven days per week and 24 hours per day.

Traditional branch hours vary market to market based on transaction volume and local demand. Generally, traditional branch hours are Monday through Thursday from 9 am to 5 pm and Friday from 9 am to 6 pm. WNB also offers Saturday lobby hours in the majority of traditional branches from 9 am to 2 pm. WNB's banking hours and services had a positive impact on delivery of retail banking services throughout all AAs.

We did not identify any legal, financial, or other factors that impede the bank's ability to help meet the credit needs in its AAs. The bank received a *Needs to Improve* rating at the last CRA Examination, dated June 23, 2012, primarily because of nominal lending activity in the vast majority of the AAs.

**Scope of the Evaluation****Evaluation Period/Products Evaluated**

WNB qualifies as a large bank under the CRA regulation and is therefore subject to being evaluated under the Lending, Investment, and Service Tests.

The scope of this evaluation includes all loans subject to filing under the HMDA and all small loans to businesses and farms subject to filing under CRA data collection. At the bank's request, we also reviewed the ReLi loan product categorized as consumer loans. CD loans, investments, and services include all activities that meet the regulatory definition.

The evaluation period includes all loans originated or purchased from January 1, 2012 through June 30, 2015. The Office of Management and Budget (OMB) revised the geographic boundaries for MAs and these revisions became effective for CRA purposes on January 1, 2014. As a result of the OMB changes, we performed two separate lending analyses for each rating area for the Lending Test. Loans originated between January 1, 2012 and December 31, 2013 were analyzed using 2010 census data. Whereas, loans originated in 2014 and 2015 were analyzed using 2010 census data, but also included changes to the AA made by OMB.

The evaluation period for CD loans, investments and services include all activities from June 23, 2012 through July 13, 2015. The evaluation period for retail banking services was June 23, 2012 through June 30, 2015. The qualified investments and retail banking services for the entire evaluation period are included in the 2014/2015 tables.

In reviewing the bank's retail banking services, we reviewed the location of branches and also considered the bank's business model, which primarily includes in-store branch locations for all markets outside of Houston. We also considered the degree the bank serves low- and moderate-income individuals which is further demonstrated by their consumer lending activity.

## **Data Integrity**

The OCC verified the accuracy of the bank's HMDA, small loans to businesses and consumer loan data in April 2015. We also reviewed the appropriateness of the bank's CD loans, investments and service activities that management provided us for consideration.

## **Selection of Areas for Full-Scope Review**

A sample of AAs in 17 states and two MMAs (Chicago and Washington DC) were selected for full-scope review. Performance in the remaining four MMAs – Charlotte, Cincinnati, Louisville and Myrtle Beach – were also evaluated using full-scope procedures. We considered several factors in selecting these full-scope areas including: the size of the population in the AA, level of the bank's lending, investment and service activity in the area, the significance of the bank's deposit base and branching network in the area, the needs and opportunities in the area and the length of time since the AA was last reviewed.

Refer to the "Scope" section under each state and the "Multistate Metropolitan Area Rating" section for the full-scope AAs selected during this evaluation.

## **Ratings**

The bank's overall rating is a blend of the multistate AA ratings and the state ratings. While the state of Texas carried more emphasis than the other rating areas, the consolidated performance of all remaining rating areas influenced the overall bank rating.

The bank's lending activities for 2012/2013 and 2014/2015 was considered equally. Although 2014/2015 represents a shorter review period, it better reflects a change in the bank's overall lending strategy as the bank's strategy changed during this timeframe.

Since the bank began offering the ReLi product in 2013, generally, the bank's lending performance during 2012/2013 is weaker than their 2014/2015 performance. Tables for 2012/2013 are not included in this document but the bank's performance is discussed.

The overall Lending, Investment, and Service Test ratings for the multistate MSA and each state are primarily based on conclusions drawn on those areas that received full-scope reviews.

In many markets, the bank made few, if any, home purchase, home improvement, multifamily, small business or farm loans. When there were no loans or a nominal number of loans made in a rating area, it was noted in the narrative for the applicable rating area and briefly discussed in the bank's lending activity.

Equal emphasis was placed on the geographic distribution and lending by borrower income level. We also gave equal consideration to the bank's lending performance to low- and moderate-income geographies and/or individuals.

Geographic and borrower distribution conclusions for HMDA, consumer loans, small business, and small farm lending provided the most consideration in determining the overall Lending Test conclusions. Within the home mortgage category, greater emphasis was placed on home refinance loans as the bank made more of these type of loans than any other product. Furthermore, WNB's current lending strategy is not to make home purchase loans. While lesser emphasis is placed on community development in determining the overall Lending Test conclusions, a significant volume of loans that are responsive to the identified needs in the community can elevate the Lending Test rating. In determining the conclusions for the Investment Test, the dollar volume of the investment activity and the responsiveness to the community's credit needs were given greater emphasis.

Finally, when determining the Service Test conclusions, accessibility of branch offices and changes in branch locations received the greatest consideration. Branch hours and services as well as community development services received less emphasis. However, a significant volume of community development services that meet identified needs in the community can increase the Service Test rating. Positive consideration was given to the number of service hours WNB provided to qualified community development organizations. Generally, the same types of products and services are offered throughout WNB's footprint and branch hours may vary in each market, but not significantly. Therefore, the narrative regarding the bank's products and services and their banking hours is discussed in the description of the institution, but these factors were considered in all full-scope areas.

Refer to the "Scope" section under each state and multistate MA for details regarding how the ratings were determined.

## **Inside/Outside Ratio**

The inside/outside ratios were calculated at the state level rather than the overall bank level. Therefore, ratios for multi-state AAs were not calculated. Refer to the narrative under each state for the calculation for that state.

## **Other**

Community Affairs Officers from the OCC completed and/or updated community contacts in the full-scope AAs. Comments regarding these contacts are summarized in Appendix C Market Profiles for the full-scope areas.

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

Pursuant to 12 C.F.R. 25.28(c), or 12 C.F.R. 195.28(c), in determining a national bank's (bank) or Federal savings association's (FSA) CRA rating, respectively, the OCC considers evidence of discriminatory or other illegal credit practices in any geography by the bank or FSA, or in any assessment area by an affiliate whose loans have been considered as part of the bank's or FSA's lending performance. As part of this evaluation process, the OCC consults with other federal agencies with responsibility for compliance with the relevant laws and regulations, including the U.S. Department of Justice, the U.S. Department of Housing and Urban Development, and the Consumer Financial Protection Bureau.

The OCC did not identify evidence of discriminatory or other illegal credit practices with respect to this institution.

The OCC will consider any evidence of discriminatory or other illegal credit practices relative to this institution that other regulators may provide to the OCC before the end of the institution's next performance evaluation in that subsequent evaluation, even if the information provided concerns activities that occurred during the evaluation period addressed in this performance evaluation.

## Multistate Metropolitan Area Rating

### Charlotte Multistate MSA

**CRA rating for the Charlotte MMSA<sup>1</sup>: Satisfactory**

**The Lending Test is rated: High Satisfactory**

**The Investment Test is rated: High Satisfactory**

**The Service Test is rated: High Satisfactory**

The major factors that support this rating include:

- The overall level of lending is good. Overall, the geographic distribution of loans is good. The distribution of loans by borrower income level is also good.
- The level of CD loans is good.
- The level of CD investments is good.
- Retail banking services are reasonably accessible to low- and moderate-income geographies and individuals in the AA. The level of CD services is excellent and therefore increased the Service Test rating.

### Description of Institution's Operations in the Charlotte MMSA

The Charlotte-Concord-Gastonia NC-SC multistate MSA (MMSA) AA (Charlotte AA) encompasses the counties of Cabarrus, Gaston, Iredell, Lincoln, Mecklenburg, Rowan and Union in North Carolina, and Lancaster and York counties in South Carolina. The counties of Iredell and Lincoln in North Carolina and Lancaster County in South Carolina were added to the MMSA in 2014 as a result of the OMB changes. The bank's AA includes the entire MMSA.

WNB has 18 branches in this AA and this represents 2 percent of the bank's branching network. The bank has five branches in Mecklenburg county, three in York county, two each in Iredell, Gaston, Cabarrus counties and one each in Lancaster, Union, Lincoln and Rowen counties. Based on June 30, 2014 Federal Deposit Insurance Corporation (FDIC) market share information, WNB has a deposit market share of 0.01 percent in the Charlotte AA. The Charlotte AA represents 0.69 percent of the bank's total deposit base and the bank has \$26 million in deposits in this AA.

Refer to the market profiles for the Charlotte AA in Appendix C for detailed demographics and other performance context information for AAs that received full-scope reviews.

### Scope of Evaluation in the Charlotte MMSA

The Charlotte AA was selected to receive a full-scope review. Refer to the tables in Appendix D for more information on lending activity for the Charlotte AA.

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

## **LENDING TEST**

The bank's performance under the Lending Test in the Charlotte MMSA AA is rated High Satisfactory. Based on a full-scope review, the bank's performance in the Charlotte MMSA AA is good.

### **Conclusions for Areas Receiving Full-Scope Reviews**

#### **Lending Activity**

The bank's overall volume of loans in the Charlotte MMSA AA is good. Lending levels are good considering the bank's size, capacity and presence in the market.

Refer to Tables 1 Lending Volume in the Charlotte MMSA AA section of Appendix D for the facts and data used to evaluate the bank's lending activity.

During this evaluation period, WNB made 110 home mortgage refinance loans, 71 small loans to businesses, and 1,103 consumer loans. The bank made no home purchase, home improvement multifamily or small farm loans during this evaluation period. Therefore, no analysis of these products were performed.

More emphasis was placed on consumer loans rather than refinance or small loans to businesses as consumer loans represent 85.90 percent of all loans originated in this AA. Also, consumer loans are responsive to an identified need in the community. The bank's home refinance and small loans to businesses were given equal emphasis.

WNB is not a predominant home mortgage lender or small business lender in this AA. With respect to mortgage lending, in 2013, WNB ranked 100 out of 540 lenders in overall market share for refinance loans in this AA. WNB had nominal market share of 0.10 percent. With respect to small loans to businesses, in 2013, WNB ranked 63 out of 114 lenders in overall market share for total small loans to businesses in this AA. WNB had total market share of 0.01 percent. Market share data is not available for consumer loans.

In terms of deposit market share in this AA, according to June 30, 2014 FDIC data, WNB ranked 43 out of 49 institutions with a nominal market share of 0.01 percent. When we considered the bank's presence in the market and their resources and size, the bank's overall level of lending is good.

#### **Distribution of Loans by Income Level of the Geography**

Overall, WNB's geographic distribution of loans is good. The geographic distribution of refinance loans is good. The distribution of small loans to businesses is adequate. As previously stated, more emphasis was given to the bank's consumer lending. The geographic distribution of consumer loans is excellent.

### ***Home Refinance Loans***

Refer to Tables 4 in the Charlotte AA section of Appendix D for the facts and data used to evaluate the geographic distribution of the bank's home mortgage loan refinance originations.

Overall, the geographic distribution of refinance loans is good.

For 2012/2013, the geographic distribution of loans is adequate. Their distribution of loans in both low-and moderate-income tracts is somewhat lower than the percentage of owner-occupied housing units in these geographies, which reflects poor performance. However, the bank's 2013 market share is good. Their market share of loans in low-income tracts is near their overall market share of loans made in all tracts. In addition, their market share in moderate-income tracts exceeds their overall market share of loans.

The geographic distribution for 2014/2015 is excellent. However, this conclusion is based on a small population of 26 loans. Therefore, the actual number of loans did not differ significantly in each tract category. For 2014/2015, the distribution of loans in both low- and moderate-income tracts exceeds the percentage of owner-occupied housing units in these geographies. Their 2014 market share in both low- and moderate-income census tracts also exceeds their overall market share of loans in all tracts.

### ***Small Loans to Businesses***

Refer to Tables 6 in the Charlotte MMSA AA section of Appendix D for the facts and data used to evaluate the geographic distribution of the bank's small loans to businesses.

Overall, the geographic distribution of small loans to businesses is adequate.

In 2012/2013, the bank made three small loans to businesses in this AA, of which one was located in a low-income tract. While this does demonstrate a willingness to make loans in low-income tracts, the overall lack of lending in 2012/2013 had a negative impact on the overall geographic distribution conclusion for this AA.

For 2014/2015, the bank's geographic distribution of small loans to businesses is good. Their distribution of small loans to businesses in low- income tracts is near the percentage of small businesses located in these geographies. However, their distribution of loans in moderate-income tracts significantly exceeds the number of small businesses located in these geographies. Their performance in moderate-income tracts is significant enough to compensate for their lesser performance in low-income tracts.

Their 2014 market share is adequate. Their market share in low-income tracts is lower than their overall market share and demonstrates very poor performance. Whereas, their market share in moderate-income tracts significantly exceeds their overall market share.

### ***Consumer Loans***

Refer to Tables 13 in the Charlotte AA section of Appendix D for the facts and data used to evaluate the geographic distribution of the bank's consumer loan originations. More emphasis was assigned to the 2014/2015 performance than the 2012/2013 performance.



The geographic distribution of consumer loans is excellent.

For 2012/2013, the bank's geographic distribution of consumer loans is excellent. Their distribution of loans in both low- and moderate-income tracts exceeds the percentage of households in the geographies. Market share data is not available for consumer loans.

For 2014/2015, the bank's geographic distribution of consumer loans is also excellent. Their distribution of loans in both low- and moderate-income tracts exceeds the percentage of households in these geographies.

### ***Lending Gap Analysis***

A lending gap analysis was not performed for this AA, as the lending volume in the Charlotte MMSA AA was insufficient to perform a meaningful analysis.

### **Distribution of Loans by Income Level of the Borrower**

Overall, WNB's distribution of loans by income level of the borrower is good. The bank's distribution of both refinance and small loans to businesses is good. As discussed previously, more consideration was given to the bank's consumer lending performance in arriving at the overall conclusion. Their distribution of consumer loans is excellent.

### ***Home Refinance Loans***

Refer to Table 10 in the Charlotte MMSA AA section of Appendix D for the facts and data used to evaluate the borrower distribution of the bank's home mortgage refinance loan originations.

The distribution of the bank's home refinance loans is good.

For 2012/2013, the distribution of loans is good. The distribution of loans to low-income families is somewhat lower than the percentage of low-income families in the AA. This reflects poor performance. However, their distribution of loans to moderate-income families is excellent as their distribution of loans significantly exceeds the percentage of moderate-income families in the AA. In addition, the bank's 2013 market share to both low- and moderate-income borrowers is excellent. The bank's market share to both low- and moderate-income borrowers exceeds their overall market share of loans to all borrowers.

The bank's distribution of loans for 2014/2015 is excellent. Their distribution of refinance loans to both low- and moderate-income families exceeds the percentage of moderate-income families in the AA. In addition, the bank's 2014 market share to both low- and moderate-income families exceeds their overall market share of loans to all families.

### ***Small Loans to Businesses***

Refer to Tables 11 in the Charlotte MMSA AA section of Appendix D for the facts and data used to evaluate the borrower distribution of the bank's small loans to businesses.

Overall, the borrower distribution of small loans to businesses is good.

The bank's borrower distribution of small loans to businesses for 2012/2013 was not evaluated, as the volume of loans was not sufficient to perform a meaningful analysis, as the bank made three loans during this period. However, we did note that one of the three loans was made to a small business. The bank's poor lending performance in 2012/2013 had a negative impact on the overall conclusions.

The distribution of small loans to businesses for 2014/2015 is excellent. Their distribution of small loans to small businesses (businesses with gross annual revenue of \$1 million or less) exceeds the percentages of these businesses in the AA. Additionally, their small business market share exceeds their overall market share of loans to all businesses.

### ***Consumer Loans***

Refer to Tables 13 in the Charlotte MMSA AA section of Appendix D for the facts and data used to evaluate the borrower income distribution of the bank's consumer loan originations.

The borrower income distribution of consumer loans is excellent.

For 2012/2013, the bank's borrower income distribution of loans is excellent. The bank's distribution of consumer loans to both low- and moderate-income households significantly exceeds the percentages of these households.

For 2014/2015, the bank's borrower income distribution of loans is also excellent. The bank's distribution of consumer loans to both low and moderate-income households significantly exceeds the percentage of these households in the AA. Market share data is not available for consumer loans.

### **Product Innovation and Flexibility**

WNB has established a lending partnership with a nationwide mortgage lender in manner that ensures that a full array of mortgage financing products are available to serve the full market of qualified borrowers in the communities where the bank conducts business. These programs had a neutral impact on the bank's lending performance.

### **Community Development Lending**

Refer to Table 1 Lending Volume in the Charlotte MMSA AA section of Appendix D for the facts and data used to evaluate the bank's level of community development lending. The totals on this table include all CD loans, including multifamily loans that qualified for CD purposes during the evaluation period.

### **Conclusions for Areas Receiving Full-Scope Reviews**

CD lending had a positive impact on lending performance in the Charlotte AA. During this evaluation period, WNB made 13 CD loans in this multistate MSA totaling \$585,000 or 16 percent of allocated Tier One Capital. These loans were not considered complex or innovative but show good responsiveness to meeting some of the identified needs in the AA. Small dollar, affordable housing and economic development loans were identified needs in all assessment areas and 85 percent of the CD loans made in this AA addressed these needs.

This level of CD lending is good given the numerous opportunities in the AA to make CD loans and the bank's responsiveness to meeting identified credit needs in this MSA.

Specific details regarding the bank's CD lending activities include:

- Nine loans totaling \$340,000 to qualified organizations to provide affordable housing for low- and moderate-income individuals.
- One loan for \$155,000 to an organization that provides small business loans and financial training to start-up and existing businesses.
- Three loans totaling \$90,000 (the AAs allocated portion) to an organization that promotes crime prevention for senior citizens.

The primary objective of this foundation is to reduce crime in the nation's senior housing facilities and to provide ongoing, effective crime prevention programs that promote safe, secure and high quality of life environments for senior housing residents. WNB provided supporting documentation that shows the bank adjusted its community development strategy and changed the collateral with the foundation. The existing collateral of two Ginnie Mae mortgage-backed securities (MBS) pools benefits LMI households. The loan funds help ensure a safe and secure crime-free residence to low- to moderate-income residents. The loan meets the regulatory definition of a CD loan.

## **INVESTMENT TEST**

WNB's performance under the Investment Test for the Charlotte multistate AA is rated High Satisfactory. Based upon a full-scope review, the bank's performance in the Charlotte multistate AA is good.

## **Conclusions for Areas Receiving Full-Scope Reviews**

Refer to Table 14 in Appendix D for the facts and data used to evaluate the bank's level of qualified investments.

Numerous opportunities exist to make CD investments in this AA. WNB's level of qualified CD investments and grants is good. In aggregate, current and prior period investments total \$2.6 million in the Charlotte AA and approximately 73 percent of allocated Tier One Capital. These investments were not innovative or flexible but given the dollar volume of investments made, their CD investment level is good.

During the evaluation period, WNB made 18 qualified investments in the Charlotte AA, totaling \$2.1 million. These qualified investments include 15 MBSs totaling \$2.0 million, where the underlying home mortgages were made to low- and moderate-income borrowers located throughout the multistate AA.

In addition, WNB also made three investments for grants to local community organizations that provide community development services to low- to moderate-income individuals and geographic areas, totaling \$86,000.

WNB has five prior period investments, totaling \$449,000 still outstanding at the end of the current evaluation period. These investments supported affordable housing for low- or moderate-income individuals in the AA and were earmarked for WNB as part of an investment fund. These affordable housing units continue to have a positive impact on the AA.

## **SERVICE TEST**

The bank's performance under the Service Test in the Charlotte multistate AA is rated High Satisfactory. Based on a full-scope review, the bank's performance in the Charlotte AA is good. An excellent level of CD services increased the Service Test rating and improved the bank's performance in the AA.

## **Conclusions for Areas Receiving Full-Scope Reviews**

### **Retail Banking Services**

Refer to Table 15 in the Charlotte AA section of Appendix D for the facts and data used to evaluate the distribution of the bank's branch delivery system and branch openings and closings.

The bank's delivery systems are reasonably accessible to geographies and individuals of different income levels in the AA.

WNB operates 18 banking offices in the Charlotte MSA AA, all of which are located in Wal-Mart stores. Of these, none are located in low-income CTs and therefore the bank's branch distribution in these tracts is significantly lower than the percentage of the population in the AA. Approximately 7 percent of the population resides in low-income tracts. In moderate-income tracts, the bank's percentage of branches is lower than the percentage of the population in the area. Approximately 16.66 percent (3) of the bank's branches are in moderate-income CTs whereas 23.15 percent of the population reside in these tracts. The majority of the population, approximately 69.75 percent, resides in middle- and upper-income CTs.

The bank's record of opening and closing branches has not adversely affected the accessibility of delivery systems, particularly in low- or moderate-income geographies or to low- or moderate-income families in the area. During this evaluation period, there was no banking offices closed in the AA, however the bank opened one office located in an upper-income CT.

### **Community Development Services**

In the Charlotte MSA, WNB's record of providing CD services is excellent based on their resources and their responsiveness to identified needs in the community. This helped to elevate the Service Test rating.

We identified a significant number of non-profit organizations and one community development financial institution (CDFI) that operates in this AA and WNB provided a substantial number of CD services to these organizations, during this evaluation period.

WNB provided financial literacy classes using the FDIC's Money Smart program and held classes totaling 962 hours for low- and moderate-income individuals in the area. The number of hours provided demonstrate an excellent responsiveness and further illustrates the bank's commitment and dedication to financial literacy education.

In addition to the financial education, bank employees also provide financial services to local CD organization through memberships and participations on board and committees. There are 18 employees who serve on the board or committees for local homeless shelters, an organization that serves underprivileged children, several affordable housing organizations and a local economic development council.

## Chicago Multistate MSA

**CRA rating for the Chicago MMSA<sup>2</sup>: Satisfactory**

**The Lending Test is rated: Low Satisfactory**

**The Investment Test is rated: High Satisfactory**

**The Service Test is rated: Needs to Improve**

The major factors that support this rating include:

- The overall level of lending is adequate. The geographic distribution of loans is excellent. The distribution of loans by borrower income level is also excellent.
- The level of CD loans is adequate and had a positive impact on the bank's lending performance.
- The level of CD investments is good.
- The bank's delivery systems are unreasonably inaccessible to portions of its AA, particularly to low- or moderate-income geographies or to low- or moderate-income individuals.

### Description of Institution's Operations in the Chicago MMSA

Prior to 2014, the bank's Chicago AA was a MSA within the state of Illinois. With the 2014 OMB changes, the Chicago MSA became a multistate MSA composed of four MDs. Those MDs include: (1) Chicago-Naperville-Arlington Heights IL (Chicago), (2) Elgin IL, (3) Lake County IL, and (4) Gary IN. WNB operates 16 banking offices in the Chicago MMSA. These branches are all non-traditional in-store offices located in Wal-Mart stores.

A full-scope examination was completed on Chicago MD and the other three MDs were reviewed as limited scope.

WNB has nine branches in the Chicago MD AA. The Chicago MD represents 56.06 percent of the deposits in the Chicago MMSA therefore; the bank's performance in this AA will drive the rating for the entire MMSA. The Chicago MD represents 1 percent of the bank's branching network. Based on June 30, 2014 FDIC market share information, WNB has a deposit market share of 0.0 percent in the Chicago MD. This AA represents 0.25 percent of the bank's total deposit base and WNB has \$12 million in deposits in this AA.

Refer to the market profiles for the Chicago AA in Appendix C for detailed demographics and other performance context information for AAs that received full-scope reviews.

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

## **Scope of Evaluation in the Chicago MMSA**

The Chicago AA was selected to receive a full-scope review. Refer to the tables in Appendix D for more information on lending activity for the Chicago AA. We also analyzed the bank's 2012/2013 performance in the Chicago MSA and their performance was not inconsistent with 2014/2015.

## **LENDING TEST**

The bank's performance under the Lending Test in the Chicago AA is rated Low Satisfactory. Based on a full-scope review, the bank's performance in the Chicago AA is adequate.

## **Lending Activity**

The bank's overall volume of loans in the Chicago AA is adequate. Lending levels are adequate considering the bank's size, capacity and presence in the market.

Refer to Table 1 Lending Volume in the Chicago AA section of Appendix D for the facts and data used to evaluate the bank's lending activity.

With the 2014 OMB changes, the Chicago multistate AA was created. Therefore, the lending analysis only reflects 2014/2015 performance. During this time period, WNB made 22 home refinance loans, 83 small loans to businesses, and 303 consumer loans. This loan volume is adequate given the bank's size and capacity.

The bank made no home purchase, multifamily or small farm loans and one home improvement loan in this AA as a result, no analysis was performed on these products.

More emphasis was placed on consumer loans rather than refinance loans or small loans to businesses as consumer loans represent 74.26 percent of all loans originated in this AA. The bank's small loans to businesses received more consideration than the home refinance loans. WNB is not a predominant home mortgage lender or small business lender in this AA.

In 2014, the bank was ranked 229 out of 644 lenders in making refinance loans in this AA. The bank had nominal market share of 0.03 percent. The bank ranked 71 out of 198 lenders in the AA in 2014 in making small loans to businesses. The bank's market share was 0.05 percent. Market share data is not available for consumer loans.

With respect to deposit market share in this AA, as of June 30, 2014, WNB ranked 173 out of 181 institutions with a market share of 0.00 percent. Based on the bank's deposit market share, their lending activity for refinance, consumer and small loans to businesses is adequate.

## **Distribution of Loans by Income Level of the Geography**

Overall, WNB's geographic distribution of loans is excellent. The geographic distribution of refinance loans, small loans to businesses and consumer loans is excellent.

### ***Home Refinance Loans***

Refer to Table 4 in the Chicago MMSA AA section of Appendix D for the facts and data used to evaluate the geographic distribution of the bank's home mortgage loan refinance originations.

The geographic distribution of home refinance loans is excellent. This conclusion is based on a small sample of 22 loans. Therefore, the number of loans in each tract category did not vary significantly.

For 2014/2015, the distribution of refinance loans in both low- and moderate-income tracts exceeds the percentage of owner-occupied housing units in these geographies. The bank's 2014 market share in both low- and moderate-income tracts exceed their overall market share of loans in all tracts.

### ***Small Loans to Businesses***

Refer to Table 6 in the Chicago MMSA AA section of Appendix D for the facts and data used to evaluate the geographic distribution of the bank's small loans to businesses for 2014/2015.

The geographic distribution of small loans to businesses is excellent.

For 2014/2015, the distribution of small loans to businesses in both low- and moderate-income geographies exceeds the number of businesses in these geographies. Furthermore, the bank's market share in 2014 in both low- and moderate-income census tracts exceeds their overall market share of loans in all tracts.

### ***Consumer Loans***

Refer to Table 13 in the Chicago MMSA AA section of Appendix D for the facts and data used to evaluate the geographic distribution of the bank's consumer loan originations.

The geographic distribution of consumer loans is also excellent.

For 2014/2015, the bank's geographic distribution of loans in both low- and moderate-income tracts exceeds the percentage of households in these tracts. Market share data is not available for consumer loans.

### ***Lending Gap Analysis***

A lending gap analysis was not performed for this AA, as the lending volume in the Chicago MMSA AA was insufficient to perform a meaningful analysis.

### **Distribution of Loans by Income Level of the Borrower**

Overall, WNB's distribution of loans by income level of the borrower is excellent. The bank's distribution of all three products, refinance, consumer and small loans to businesses, is excellent.



### ***Home Refinance Loans***

Refer to Table 10 in the Chicago MMSA AA section of Appendix D for the facts and data used to evaluate the borrower distribution of the bank's home mortgage refinance loan originations.

The distribution of the bank's home refinance loans is excellent.

For 2014/2015, the distribution of refinance loans to both low- and moderate-income families exceeds the percentage of low- and moderate-income families in the AA. In addition, the bank's 2014 market share to both low- and moderate-individuals is excellent as it exceeds their overall market share of loans to all individuals.

### ***Small Loans to Businesses***

Refer to Table 11 in the Chicago MMSA AA section of Appendix D for the facts and data used to evaluate the borrower distribution of the bank's small loans to businesses for 2014/2015.

The borrower distribution of small loans to businesses is excellent.

For 2014/2015, the distribution of small loans to businesses with gross annual revenue of \$1 million or less exceeds the percentages of these businesses in the AA. Furthermore, the bank's 2014 small business market share exceeds their overall market share of loans to all businesses.

### ***Consumer Loans***

Refer to Table 13 in the Chicago MMSA AA section of Appendix D for the facts and data used to evaluate the borrower income distribution of the bank's consumer loan originations.

The borrower income distribution of consumer loans is excellent.

For 2014/2015, the bank's distribution of loans to low-income households significantly exceeds the percentage of low-income households in this AA. Their distribution of loans to moderate-income households is near the percentage of moderate-income households in the AA, which reflects good performance. In arriving at the overall conclusion, we considered the fact that the bank's performance in low-income tracts is significant enough to compensate for their lesser performance in moderate-income tracts. Market share data is not available for consumer loans.

### ***Product Innovation and Flexibility***

WNB has established a lending partnership with a nationwide mortgage lender in manner that ensures that a full array of mortgage financing products are available to serve the full market of qualified borrowers in the communities where the bank conducts business. These programs had a neutral impact on the bank's lending performance.

## **Community Development Lending**

Refer to Table 1 Lending Volume in the Chicago MMSA section of Appendix D for the facts and data used to evaluate the bank's level of community development lending. This table includes all CD loans, including multifamily loans that also qualify as CD loans.

### **Conclusions for Areas Receiving Full-Scope Reviews**

CD lending had a positive impact on lending performance in the Chicago AA. During this evaluation period, WNB made three CD loans in the AA totaling \$185,000 to organizations that provide affordable housing and community services to low- and moderate-income individuals. This total represents 15 percent of allocated Tier One Capital. This level of CD lending is adequate given the numerous opportunities to make CD loans in this AA and the bank's responsiveness to meeting the identified need for community services in the community. These loans were not innovative or complex but did address identified needs in the AA.

One loan for \$100,000 was made to a qualified organization to fund micro-loans to small businesses. The other two loans provided community development services for low- and moderate-income families in the AA including a \$60,000 loan to an organization that provides vehicles to low- and moderate-income borrowers as a means of transportation to work.

### **Conclusions for Areas Receiving Limited-Scope Reviews**

Based on limited-scope reviews, the bank's performance under the Lending Test in the Elgin MSA, Gary MSA and Lake County MSA is not inconsistent with the bank's performance in the full-scope AA. The bank's performance in the limited-scope AAs had a neutral impact on the overall rating for this multistate AA.

Refer to Tables 1 through 13 in Appendix D for this AA for the facts and data that support these conclusions.

## **INVESTMENT TEST**

The bank's performance under the Investment Test for the Chicago AA is rated High Satisfactory. Based upon a full-scope review, the bank's performance in the Chicago multistate AA is good.

### **Conclusions for Areas Receiving Full-Scope Reviews**

Refer to Table 14 in Appendix D for the facts and data used to evaluate the bank's level of qualified investments.

The level of CD investments is good. The bank has many opportunities to make qualified CD investments in the Chicago AA and WNB made 21 investments in the full-scope AA amounting to \$1.5 million during this evaluation period. This investment total represents 123 percent of allocated Tier One Capital.

During this evaluation period, the bank purchased 11 MBSs totaling \$1.5 million, where the underlying home mortgages were made to low- and moderate-income borrowers. In addition, WNB made ten grants for \$36,000 to local organizations that provide community development services to low- to moderate-income individuals.

Examples of the community development organizations include The Salvation Army, Alliance of Family Services, Child and Family Services of Illinois, Money Smart Week Chicago, and the local food bank. The investments were not considered innovative or flexible in nature but were responsive to the needs of the AA and supported community development services targeted to low- and moderate-income individuals in the bank's multistate MSA.

Also, WNB has four qualified investments totaling \$636,000 still outstanding from the last examination. These investments supported affordable housing for low- or moderate-income individuals in the AA and were earmarked for WNB as part of an investment fund. These affordable housing investments continue to have a positive impact on the AA as they continue to provide much needed housing in the AA.

### **Conclusions for Areas Receiving Limited-Scope Reviews**

Based on limited-scope reviews, the bank's performance under the Investment Test in Elgin AA and Lake County AA limited-scope AAs is not inconsistent with the bank's performance in the full-scope AA. Performance in the Gary AA is weaker than the bank's performance in the full-scope AA and this AA represents 17.76 percent of the deposits in the Chicago MMSA. The weaker performance is attributed to lower investment totals than amounts in the other AAs. The combined performance in the limited-scope AAs was not significant enough to impact the overall rating for the multi-state AA.

Refer to Table 14 in Appendix D for this multistate AA for the facts and data that support these conclusions.

## **SERVICE TEST**

### **Conclusions for Areas Receiving Full-Scope Reviews**

The bank's performance under the Service Test in the Chicago AA is rated Needs to Improve. Based on a full-scope review, the bank's performance in the Chicago MD AA is poor.

### **Retail Banking Services**

Refer to Table 15 in the Chicago AA section of Appendix D for the facts and data used to evaluate the distribution of the bank's branch delivery system and branch openings and closings.

The bank's delivery systems are unreasonably inaccessible to portions of the bank's AA, particularly low- and moderate-income geographies and individuals.

WNB operates nine banking offices in the Chicago MD AA, all of which are located in Wal-Mart stores. Of these, none are located in either low- or moderate-income CTs.

Therefore, the percentage of branches in low- and moderate-income tracts is significantly lower than the percentage of the population that resides in these tracts. The population residing in low-income tracts is 9.57 percent and 22.44 percent in moderate-income tracts.

The bank's record of opening and closing branches has not adversely affected the accessibility of delivery systems, particularly in low- or moderate-income geographies or to low- or moderate-income families in the area. During this evaluation period, there were three banking offices closed in the AA that were located in upper-income census tracts. These closures were due to unprofitable performance, low customer traffic and the expiration of the lease contract.

## **Community Development Services**

In the Chicago AA, WNB's record of providing CD services is good based on their resources and their responsiveness to identified needs in the community. We identified a significant number of non-profit organizations and CDFIs that operate in this AA. During this evaluation period, WNB provided financial literacy training using the FDIC's Money Smart program and held classes totaling 404 hours for low- and moderate-income individuals in the area. In addition, there are three bank officers who serve on the boards or committees for two local food banks and an affordable housing organization.

## **Conclusions for Areas Receiving Limited-Scope Reviews**

Based on limited-scope reviews, the bank's performance under the Service Test in the Elgin IL MD and Lake County IL MD is not inconsistent with the bank's overall Needs to Improve performance in the full-scope AA. These areas represent 26.19 percent of the Chicago MMSA's total deposits.

The performance in the Gary IN MD is stronger than the performance in the full-scope multistate AA. The stronger performance is attributable to a stronger branch distribution in the low- and moderate-income tracts. This AA represents 17.76 percent of the state's deposits and did not impact the full-scope AA rating. Performance in the limited-scope AA was not significant enough to impact the rating for the Chicago MMSA.

## Cincinnati Multistate MSA

**CRA rating for the Cincinnati MMSA<sup>3</sup>: Satisfactory**

**The Lending Test is rated: Low Satisfactory**

**The Investment Test is rated: High Satisfactory**

**The Service Test is rated: Low Satisfactory**

The major factors that support this rating include:

- The overall level of lending is adequate. The geographic distribution of loans is adequate. The distribution of loans by borrower income level is good.
- WNB's level of CD lending is adequate and had a positive impact on the lending performance in the Cincinnati AA.
- The level of CD investments is good and demonstrated good responsiveness to meeting some of the identified needs in the AA.
- Retail banking services are reasonably accessible to geographies and individuals of different income levels in the AA. The level of CD services is good.

### Description of Institution's Operations in the Cincinnati MMSA

The bank's Cincinnati OH-KY-IN multistate MSA AA (Cincinnati AA) encompasses the counties of Dearborn in Indiana, Campbell in Kentucky, and Brown, Butler, Clermont, Hamilton, and Warren in Ohio.

WNB has 10 branches in this AA. Three branches are located in Hamilton county, two branches each located in Warren and Clermont counties and one branch each located in Butler, Campbell and Dearborn counties. The Cincinnati AA represents 1 percent of the bank's branching network. Based on FDIC deposit market share information as of June 30, 2014, WNB has a deposit market share of 0.01 percent in the Cincinnati AA. The Cincinnati AA represents 0.19 percent of the bank's total deposit base and has \$7 million in deposits in this AA.

Refer to the market profiles for the Cincinnati AA in Appendix C for detailed demographics and other performance context information for AAs that received full-scope reviews.

### Scope of Evaluation in the Cincinnati MMSA

The Cincinnati AA was selected to receive a full-scope review. Refer to the tables in Appendix D for more information on lending activity for the Cincinnati AA.

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<sup>3</sup> This rating reflects performance within the multistate metropolitan area. The statewide evaluations do not reflect performance in the parts of those states contained within the multistate metropolitan area.

## **LENDING TEST**

### **Conclusions for Areas Receiving Full-Scope Reviews**

The bank's performance under the Lending Test in the Cincinnati MMSA AA is rated Low Satisfactory. Based on a full-scope review, the bank's performance in the Cincinnati MMSA AA is adequate.

### **Lending Activity**

Refer to Tables 1 Lending Volume in the Cincinnati AA section of Appendix D for the facts and data used to evaluate the bank's lending activity.

The bank's overall volume of loans in the Cincinnati AA is adequate. Lending levels are adequate considering the bank's size, capacity and presence in the market. As stated previously, WNB has 10 banking offices in this AA and has \$7 million in deposits.

During this evaluation period, WNB made 68 home refinance mortgage loans, 24 small loans to businesses, and 401 consumer loans. This level of lending is adequate given the bank's size and resources. Home purchase, home improvement, multifamily, and small farm loans were not analyzed, as the bank did not make a sufficient volume of loans to perform a meaningful analysis. The bank made one home purchase and home improvement loan and they made no multifamily or small farm loans in this AA.

More emphasis was placed on consumer loans rather than the home mortgage refinance loans or small loans to businesses as consumer loans represent 81.34 percent of all loans originated in this AA. The bank's home refinance and small loans to businesses were given equal emphasis. WNB is not a predominant home mortgage lender or small business lender in this AA. With respect to mortgage lending, in 2013, WNB was ranked 139 out of 430 lenders in overall market share for total home refinance mortgage loans in this AA. WNB had nominal total market share of 0.05 percent. In 2013, WNB did not originate any small loans to businesses in this AA; therefore, no market share data is available. Market share data is not available for consumer loans.

With respect to deposit market share in this AA, as of June 30, 2014, WNB ranked last out of 70 institutions with a nominal market share of 0.01 percent. Given the bank's limited presence and deposit base in this AA, the bank's level of lending is considered adequate.

### **Distribution of Loans by Income Level of the Geography**

Overall, WNB's geographic distribution of loans is adequate. Their geographic distribution of consumer loans is excellent. Their distribution of refinance loans is adequate. Their distribution of small loans to businesses is poor. As previously stated, more emphasis was given to the bank's consumer loan performance.

### ***Home Refinance Loans***

Refer to Tables 4 in the Cincinnati MMSA AA section of Appendix D for the facts and data used to evaluate the geographic distribution of the bank's home mortgage loan refinance originations.

While the bank's refinance lending performance for both evaluation periods carried equal emphasis, we also considered the fact that the population of loans in both periods was small and a few more or less loans in either tract would adjust the bank's performance. Therefore, less consideration was placed on the bank's refinance loan performance than consumer loans. WNB made 36 loans in 2012/2013 and 32 in 2014/2015.

The geographic distribution of refinance loans is adequate. Poor performance in 2012/2013 had a negative impact on the overall geographic distribution conclusions.

For 2012/2013, the geographic distribution of the bank's home refinance loans is very poor. WNB did not originate any loans in either low- or moderate-income tracts during this time frame. Therefore, WNB had no market share in these tracts for 2013. This reflects very poor performance.

For 2014/2015, the geographic distribution is excellent. For 2014/2015, the distribution of home refinance loans in both low- and moderate-income tracts significantly exceeds the percentage of owner-occupied housing units in these geographies. The bank's market share for 2014 is also excellent. In both low and moderate-income tracts, the bank's market share of refinance loans exceeds their market share of loans in all tracts.

### ***Small Loans to Businesses***

Refer to Tables 6 in the Cincinnati MMSA AA section of Appendix D for the facts and data used to evaluate the geographic distribution of the bank's small loans to businesses.

The geographic distribution of small loans to businesses is poor. The overall conclusion is a blend of the bank's performance in both analysis periods. The bank made no small business loans in 2012/2013; therefore, the nominal lending activity in this time period had a negative impact on the overall performance conclusion.

The bank's performance for 2014/2015 is based on an analysis of 24 loans. Therefore, we recognize that a few more or less loans in any one tract can impact the bank's performance.

Based on our review, their geographic distribution of small loans to businesses for 2014/2015 is adequate. Their distribution of small loans to businesses in low- income tracts is very poor, as WNB did not originate any loans in low-income geographies. However, their distribution of small loans to businesses in moderate-income geographies is excellent as their distribution of loans exceeds the percentage of businesses in these geographies. The bank's 2014 market share is also adequate. WNB did not make any loans in low-income tracts in 2014. However, their market share in moderate-income tracts significantly exceeds their overall market share of loans in all tracts.

### ***Consumer Loans***

Refer to Tables 13 in the Cincinnati MMSA AA section of Appendix D for the facts and data used to evaluate the geographic distribution of the bank's consumer loan originations.

The geographic distribution of consumer loans is excellent.

For 2012/2013, the bank's geographic distribution of consumer loans is excellent. The bank's distribution of loans in both low- and moderate-income tracts exceeds the percentage of households in these geographies. Market share data is not available for consumer loans.

For 2014/2015, the bank's geographic distribution of loans is also excellent. The bank's distribution of loans in both low- and moderate-income geographies exceeds the percentage of households in these geographies.

### ***Lending Gap Analysis***

A lending gap analysis was not performed for this AA, as the lending volume in the Cincinnati AA was insufficient to perform a meaningful analysis.

### **Distribution of Loans by Income Level of the Borrower**

Overall, WNB's distribution of loans by income level of the borrower is good. The bank's distribution of both home refinance loans and small loans to businesses is adequate. As previously stated, more emphasis was given to the bank's consumer lending as the population of refinance and small business loans was small. The distribution of consumer loans is excellent.

### ***Home Refinance Loans***

Refer to Tables 10 in the Cincinnati MMSA AA section of Appendix D for the facts and data used to evaluate the borrower distribution of the bank's home mortgage refinance loan originations.

The distribution of the bank's home refinance loans is adequate.

The distribution for 2012/2013 is poor. For 2012/2013, the bank's distribution of refinance loans to low-income families is somewhat lower than the percentage of low-income families in the AA. This reflects poor performance. In addition, their distribution of loans to moderate-income families is very poor as the bank's distribution of loans is significantly lower than the percentage of moderate-income families. WNB's 2013 market share is adequate. Their market share of refinance loans to low-income borrowers is good and equals their overall market share of loans to all borrowers. However, their market share to moderate-income borrowers is lower than their overall market share.

The distribution for 2014/2015 was excellent. For 2014/2015, the portion of home refinance loans to both low- and moderate-income families exceeds the number of low- and moderate-income families. In addition, the bank's 2014 market share is also excellent.



Their market share to both low- and moderate-income borrowers significantly exceeds their overall market share of loans to all borrowers.

### ***Small Loans to Businesses***

Refer to Tables 11 in the Cincinnati MMSA AA section of Appendix D for the facts and data used to evaluate the borrower distribution of the bank's small loans to businesses.

The borrower distribution of small loans to businesses is adequate.

The overall borrower distribution of small loans to businesses is adequate. The borrower distribution of the bank's small loans to businesses for 2012/2013 was not evaluated as no loans were originated in this AA during that time frame. This had a negative impact on the overall performance conclusion for this area.

The bank's borrower distribution of small loans to businesses for 2014/2015 is excellent. The percentage of small loans to small businesses significantly exceeds the percentages of these businesses. In addition, the bank's 2014 market share to small businesses exceeds their overall market share of loans to all businesses.

### ***Consumer Loans***

Refer to Tables 13 in the Cincinnati MMSA AA section of Appendix D for the facts and data used to evaluate the borrower income distribution of the bank's consumer loan originations.

The borrower income distribution of consumer loans is excellent.

For 2012/2013, the bank's distribution of consumer loans by borrower income level is excellent. The distribution of loans to both low- and moderate-income households significantly exceeds the percentages of these households. Market share data is not available for consumer loans.

For 2014/2015, the distribution of consumer loans is also excellent. The bank's distribution of loans to low- income households significantly exceeds the percentage of these households. Their distribution of loans to moderate-income households exceeds the percentage of these households in the AA.

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

Refer to Tables 1 Lending Volume in the Cincinnati MMSA section of Appendix D for the facts and data used to evaluate the bank's level of community development lending. The totals on this table include all CD loans, including multifamily loans that qualified for CD purposes during the evaluation period.

### **Conclusions for Areas Receiving Full-Scope Reviews**

WNB's level of CD lending is adequate and had a positive impact on their lending performance in the Cincinnati AA.

During this evaluation period, the bank originated two CD loans totaling \$700,000 in this AA. This amount represents 58 percent of allocated Tier One Capital. Details regarding the bank's CD lending activities follow:

- A loan for \$500,000 to a development fund that provides financing for affordable housing development and community revitalization.
- A loan for \$200,000 to qualified organization that provides affordable housing to low- and moderate-income individuals in the AA.

Given that affordable housing and stabilization and revitalization are needs in all AAs, WNB's level of CD lending showed adequate responsiveness to addressing this need.

### **Product Innovation and Flexibility**

WNB has established a lending partnership with a nationwide mortgage lender in manner that ensures that a full array of mortgage financing products are available to serve the full market of qualified borrowers in the communities where the bank conducts business. These programs had a neutral impact on the bank's lending performance.

### **INVESTMENT TEST**

The bank's performance under the Investment Test for the Cincinnati multistate AA is rated High Satisfactory. Based upon a full-scope review, the bank's performance in the Cincinnati multistate AA is good.

### **Conclusions for Areas Receiving Full-Scope Reviews**

Refer to Table 14 in Appendix D for the facts and data used to evaluate the bank's level of qualified investments.

The level of CD investments is good. The bank has ample opportunity to make qualified CD investments in the Cincinnati AA. During the assessment period, WNB made ten qualified investments in this AA, totaling \$1 million, which represents 83 percent of allocated Tier One Capital. This level of investment is considered good given the size and available resources of WNB and further demonstrates a good responsiveness to meeting some of the identified needs in the community.

The investments were comprised entirely of MBSs, where the underlying security was primarily home mortgages to low- and moderate-income borrowers in the AA. The investments were not considered innovative or flexible in nature but did support affordable housing needs targeted to low- and moderate-income individuals in the bank's AA.

## **SERVICE TEST**

### **Conclusions for Areas Receiving Full-Scope Reviews**

The bank's performance under the Service Test in the Cincinnati AA is rated Low Satisfactory. Based on a full-scope review, the bank's performance in the Cincinnati AA is adequate.

#### **Retail Banking Services**

Refer to Table 15 in the Cincinnati AA section of Appendix D for the facts and data used to evaluate the distribution of the bank's branch delivery system and branch openings and closings.

The bank's delivery systems are reasonably accessible to geographies and individuals of different income levels in the AA.

WNB operates 10 banking offices in the Cincinnati multistate MSA AA, all of which are located in Wal-Mart stores. Of these, none are located in low-income CTs and therefore the bank's branch distribution in these tracts is significantly lower than the percentage of the population in the AA. However, with 40.00 percent (4) of the locations in moderate-income CTs, the bank's percentage of branches exceeds the percentage of the population in the area. About 6.99 percent of the population resides in low-income tracts and 19.32 percent of the population resides in moderate-income tracts.

The majority of the population, approximately 73.02 percent, resides in middle- and upper-income CTs. Based on the low population percentages in the low-income areas, more emphasis was given to performance in the moderate-income areas in assessing the bank's overall performance in the full-scope AA.

The bank's record of opening and closing branches has not adversely affected the accessibility of delivery systems, particularly in low- or moderate-income geographies or to low- or moderate-income families in the area. During this evaluation period, there were no banking offices opened or closed in the AA.

#### **Community Development Services**

In the Cincinnati AA, WNB's record of providing CD services is good based on their resources and their responsiveness to identified needs in the community. We identified a significant number of non-profit organizations and two CDFIs that operate in this AA and WNB met some of the identified needs through their financial literacy and board and committee involvement.

During this evaluation period, WNB provided financial literacy training using the FDIC's Money Smart program and held classes totaling 362 hours for low- and moderate-income individuals in the area. In addition, five bank officers served as board or committee members for two local homeless shelters, an organization that provides service to underprivileged children and a community action group, which assists homeless persons end the poverty cycle.

## **Louisville Multistate MSA**

**CRA rating for the Louisville MMSA<sup>4</sup>: Satisfactory**

**The Lending Test is rated: Low Satisfactory**

**The Investment Test is rated: High Satisfactory**

**The Service Test is rated: Needs to Improve**

The major factors that support this rating include:

- The overall level of lending is adequate. The geographic distribution of loans is excellent. The distribution of loans by income level is also excellent.
- The level of CD loans is adequate and had a neutral impact on the Lending Test rating.
- The level of CD investments is good.
- The bank's delivery systems are unreasonably inaccessible to portions of the bank's AA, particularly low- and moderate-income geographies and individuals. The level of CD services is good but volume and quality of services was not significant enough to increase the bank's Service Test rating.

### **Description of Institution's Operations in the Louisville MMSA**

The Louisville-Jefferson County KY-IN multistate MSA AA (Louisville AA) encompasses the counties of Harrison in Indiana, and Jefferson and Oldham in Kentucky.

WNB has six branches in this AA and this represents 1 percent of the bank's total branching network. The bank has four branches in Jefferson county and one branch each in Oldham and Harrison counties. Based on June 30, 2014 FDIC market share information, WNB has a deposit market share of 0.02 percent in this AA. The bank has \$4 million in deposits in this AA, which represents 0.12 percent of their total deposit base.

Refer to the market profiles for the Louisville AA in Appendix C for detailed demographics and other performance context information for AAs that received full-scope reviews.

### **Scope of Evaluation in the Louisville MMSA**

The Louisville AA was selected to receive a full-scope review. Refer to the tables in Appendix D for more information on lending activity for the Louisville AA.

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<sup>4</sup> This rating reflects performance within the multistate metropolitan area. The statewide evaluations do not reflect performance in the parts of those states contained within the multistate metropolitan area.

## **LENDING TEST**

### **Conclusions for Areas Receiving Full-Scope Reviews**

The bank's performance under the Lending Test in the Louisville AA is rated Low Satisfactory. Based on a full-scope review, the bank's performance in the Louisville MMSA AA is adequate.

### **Lending Activity**

Refer to Tables 1 Lending Volume in the Louisville MMSA AA section of Appendix D for the facts and data used to evaluate the bank's lending activity.

The bank's overall volume of loans in the Louisville AA is adequate. Lending levels are adequate considering the bank's size, capacity and presence in the market. The bank has a small deposit base and limited branching network in this AA.

During this evaluation period, WNB made 55 home mortgage refinance loans and 228 consumer loans. This loan volume is adequate given the bank's size and resources. The bank made no home purchase, home improvement, multifamily, or small farm loans during this evaluation period in this AA, therefore no analysis of these products were performed. The bank did make 10 small loans to businesses, of which we did note that one was in a low- and one in a moderate-income tract and 8 of the 10 loans were to small businesses.

We placed more emphasis on consumer loans rather than mortgage refinance loans as consumer loans represent 77.82 percent of all loans originated in this AA. WNB is not a predominant home mortgage lender in this AA. With respect to mortgage lending, in 2013, WNB was ranked 103 out of 322 lenders in overall market share for refinance loans in this AA. WNB had nominal total market share of 0.10 percent. Market share data is not available for consumer loans.

With respect to deposit market share in this AA, as of June 30, 2014, WNB ranked 41 out of 42 institutions with a nominal market share of 0.02 percent. Given the bank's limited presence and deposit base in this AA, the level of lending is considered adequate.

### **Distribution of Loans by Income Level of the Geography**

Overall, WNB's geographic distribution of loans is excellent. The geographic distribution of refinance loans is good. The geographic distribution of consumer loans is excellent. As previously stated, more emphasis was given to the bank's consumer lending.

### ***Home Refinance Loans***

Refer to Tables 4 in the Louisville MMSA AA section of Appendix D for the facts and data used to evaluate the geographic distribution of the bank's home mortgage loan refinance originations.

The geographic distribution of home refinance loans is good. However, this conclusion is based on a relatively small population of loans; 31 loans in 2012/2013 and 24 loans in 2014/2015. Whereas, movement of a few loans in any tract would impact the bank's performance.

The bank's geographic distribution of loans for 2012/2013 is adequate. WNB did not originate any refinance loans in low-income geographies, which reflects very poor performance. However, their distribution of loans in moderate-income tracts is excellent as the bank's distribution of loans exceeds the percentage of owner-occupied housing units in these tracts. Their 2013 market share is adequate. While the bank made no loans in low-income tracts, their market share in moderate-income tracts exceeds their overall market share of loans in all tracts.

For 2014/2015, the bank's geographic distribution of loans is excellent. Their distribution of loans in both low- and moderate-income tracts exceeds the percentage of owner-occupied housing units in these geographies. The bank's 2014 market share is excellent as the bank's market share in both low- and moderate-income tracts exceed their overall market share of loans in all tracts.

### ***Consumer Loans***

Refer to Tables 13 in the Louisville AA section of Appendix D for the facts and data used to evaluate the geographic distribution of the bank's consumer loan originations.

The geographic distribution of consumer loans is excellent.

For 2012/2013, the bank's geographic distribution of consumer loans is excellent. The bank's distribution of loans in both low- and moderate-income geographies exceeds the percentage of households in these geographies. Market share data is not available for consumer loans.

For 2014 and 2015, the bank's geographic distribution of consumer loans is also excellent. Their distribution of loans in both low- and moderate-income tracts exceeds the percentage of moderate-income households in the AA.

### ***Lending Gap Analysis***

A lending gap analysis was not performed for this AA, as the lending volume in the Louisville MMSA AA was insufficient to perform a meaningful analysis.

### **Distribution of Loans by Income Level of the Borrower**

Overall, WNB's distribution of loans by income level of the borrower is excellent. The bank's distribution of home refinance loans is good. As previously stated, more emphasis was given to the bank's consumer lending. The distribution of consumer loans is excellent.

### ***Home Refinance Loans***

Refer to Tables 10 in the Louisville MMSA AA section of Appendix D for the facts and data used to evaluate the borrower distribution of the bank's home mortgage refinance loan originations.

The distribution of the bank's refinance loans is good.

The distribution of loans for 2012/2013 is adequate. Their distribution of loans to low-income families is significantly lower than the percentage of low-income families in the AA. This reflects very poor performance. However, their distribution of loans to moderate-income families is near the percentage of moderate-income families, which reflects good performance. The bank's 2013 market share is also good as their market share to both low- and moderate-income borrowers is near their overall market share of loans to all borrowers.

Their distribution of loans for 2014/2015 is excellent. Their distribution of loans to both low- and moderate-income families exceeds the percentage of both low- and moderate-income families in the AA. Also, the bank's 2014 market share to both low- and moderate-income borrowers significantly exceeds their overall market share of loans to all borrowers.

### ***Consumer Loans***

Refer to Tables 13 in the Louisville AA section of Appendix D for the facts and data used to evaluate the borrower income distribution of the bank's consumer loan originations. More emphasis was assigned to the 2014/2015 performance than 2012/2013 performance.

The borrower income distribution of consumer loans is excellent.

For 2012/2013, the bank's borrower income distribution of consumer loans is excellent. The bank's distribution of consumer loans to both low- and moderate-income households exceeds the percentages of these households.

For 2014/2015, the bank's borrower income distribution of consumer loans is also excellent. The bank's distribution of consumer loans to both low- and moderate-income households exceeds the percentage of these households. Market share data is not available for consumer loans.

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

Refer to Tables 1 Lending Volume in the Louisville MSA AA section of Appendix D for the facts and data used to evaluate the bank's level of community development lending. The totals on this table include all CD loans, including multifamily loans that qualified for CD purposes during the evaluation period.

The level of CD lending is adequate and had a neutral impact on lending performance in the Louisville AA. During this evaluation period, the bank originated 3 CD loans totaling \$75,000 or 11 percent of allocated Tier One Capital. The loans provided financing to a foundation for crime prevention for senior citizens. This loan was not considered complex or innovative and was not responsive to an identified need in the AA.

The primary objective of this foundation is to reduce crime in the nation's senior housing facilities and to provide ongoing, effective crime prevention programs that promote safe, secure and high quality of life environments for senior housing residents. WNB provided supporting documentation that shows the bank adjusted its community development strategy and changed the collateral with this foundation. The existing collateral of two Ginnie Mae MBS pools benefits LMI households. The loan funds help ensure a safe and secure crime-free residence to low- to moderate-income residents. The loan meets the regulatory definition of a CD loan.

### **Product Innovation and Flexibility**

WNB has established a lending partnership with a nationwide mortgage lender in manner that ensures that a full array of mortgage financing products are available to serve the full market of qualified borrowers in the communities where the bank conducts business. These programs had a neutral impact on the bank's lending performance.

### **INVESTMENT TEST**

The bank's performance under the Investment Test for the Louisville multistate AA is rated High Satisfactory. Based upon a full-scope review, the bank's performance in the Louisville multistate AA is good.

### **Conclusions for Areas Receiving Full-Scope Reviews**

Refer to Table 14 in Appendix D for the facts and data used to evaluate the bank's level of qualified investments for the entire evaluation period.

The level of CD investments is good. The bank has ample opportunity to make qualified CD investments in the Louisville AA. During the assessment period, WNB made ten qualified investments in this AA, totaling \$1.2 million. The bank's total investment amount represented 171 percent of allocated Tier One Capital. These investment were not considered innovative or flexible in nature but were responsive to the affordable housing needs in the AA.

The investments are comprised of nine MBSs, where the underlying mortgages were made to low- and moderate-income borrowers. WNB also made one grant for \$1,000 to a local community development organization that provides community development services to homeless individuals.

### **SERVICE TEST**

### **Conclusions for Areas Receiving Full-Scope Reviews**

The bank's performance under the Service Test in the Louisville multistate MSA AA is rated Needs to Improve. Based on a full-scope review, the bank's performance in the Louisville MMSA AA is poor.



## **Retail Banking Services**

Refer to Table 15 in the Louisville AA section of Appendix D for the facts and data used to evaluate the distribution of the bank's branch delivery system and branch openings and closings.

The bank's delivery systems are unreasonably inaccessible to portions of the bank's AA, particularly low- and moderate-income geographies and individuals.

WNB operates six banking offices in the Louisville AA, all of which are located in Wal-Mart stores. Of these, none are located in either low or moderate-income CTs. Therefore, the percentage of branches in low- and moderate-income tracts is significantly lower than the percentage of the population that resides in these tracts. The population residing in the low-income tracts is 12.42 percent and 14.26 percent in moderate-income tracts.

During this evaluation period, there was no banking offices opened or closed in the AA.

## **Community Development Services**

In the Louisville AA, WNB's record of providing CD services is good based on their resources and their responsiveness to identified needs in the community. We identified a significant number of non-profit organizations and three CDFIs that operate in this AA.

During this evaluation period, WNB provided financial literacy training using the FDIC's Money Smart program and held classes totaling 312 hours for low- and moderate-income individuals in the area. In addition, the bank had four employees serving as board or committee members for various nonprofits that provide services to underprivileged children, low- to moderate-income families, and individuals recovering from an addiction.

## **Myrtle Beach Multistate MSA**

**CRA rating for the Myrtle Beach MMSA<sup>5</sup>: Satisfactory**

**The Lending Test is rated: Low Satisfactory**

**The Investment Test is rated: High Satisfactory**

**The Service Test is rated: Low Satisfactory**

The major factors that support this rating include:

- The overall level of lending is adequate. The geographic distribution of loans is adequate. The distribution of loans by borrower income level is excellent.
- The level of CD loans is adequate and had a neutral impact on the bank's lending performance.
- The level of CD investments is good. The bank demonstrated a good responsiveness to meeting the identified credit needs in the AA.
- Retail delivery systems are reasonably accessible to geographies and individuals of different income levels in the AA.

### **Description of Institution's Operations in the Myrtle Beach MMSA**

As a result of the 2014 OMB changes, Myrtle Beach is now a multistate MSA instead of a MSA. Brunswick County, NC was removed from the Wilmington, NC MSA and included in the Myrtle Beach MSA. The Myrtle Beach Conway SC-NC MMSA AA (Myrtle Beach AA) encompasses the counties of Brunswick in North Carolina, and Horry in South Carolina.

WNB has three branches in this AA, two in Brunswick county and one in Horry county. The Myrtle Beach AA represents 0.4 percent of the bank's branching network. Based on June 30, 2014 FDIC deposit information, WNB has a deposit market share of 0.08 percent in the Myrtle Beach AA. The Myrtle Beach AA represents 0.14 percent of the bank's total deposit base and WNB has \$5 million in deposits in this AA.

Refer to the market profiles for the Myrtle Beach AA in Appendix C for detailed demographics and other performance context information for AAs that received full-scope reviews.

### **Scope of Evaluation in the Myrtle Beach MMSA**

The Myrtle Beach AA was selected to receive a full-scope review. Refer to the tables in Appendix D for more information on lending activity for the Myrtle Beach AA. Prior to the 2014 OMB changes, Myrtle Beach was a MSA instead of a multi-state MSA and the review of the bank's 2012/2013 performance was included under the state of South Carolina. Based on our review, their performance in this AA for 2012/2013 is not inconsistent with the 2014/2015 performance.

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<sup>5</sup> This rating reflects performance within the multistate metropolitan area. The statewide evaluations do not reflect performance in the parts of those states contained within the multistate metropolitan area.

## **LENDING TEST**

### **Conclusions for Areas Receiving Full-Scope Reviews**

The bank's performance under the Lending Test in the Myrtle Beach AA is rated Low Satisfactory. Based on a full-scope review, the bank's performance in the Myrtle Beach AA is adequate.

#### **Lending Activity**

Refer to Table 1 Lending Volume in the Myrtle Beach AA section of Appendix D for the facts and data used to evaluate the bank's lending activity.

The bank's overall volume of loans in the Myrtle Beach AA is adequate. Lending levels are adequate considering the bank's size, capacity and presence in the market as the bank has a small deposit base and limited branch network in this AA.

Since this multi-state AA was formed in 2014 as a result of the OMB changes, the lending activity only reflects the bank's performance for the 2014/2015 time period. During this time period, WNB made 25 home mortgage refinance loans, 22 small loans to businesses, and 99 consumer loans. This volume of lending is adequate given the bank's size and resources. Home purchase, home improvement, multifamily, and small farm loans were not analyzed, as the bank did not make a sufficient volume of loans to perform a meaningful analysis. The bank made no multifamily or small farm loans and one home purchase and home improvement loan.

More emphasis was placed on consumer loans rather than the home mortgage refinance loans or small loans to businesses as consumer loans represent 67.81 percent of all loans originated in this AA. The bank's home refinance and small loans to businesses were given equal emphasis as we also considered the small population of loans in both products being reviewed. WNB is not a predominant home mortgage lender or small business lender in this AA. Market share data is not available for consumer loans.

With respect to deposit market share in this AA, as of June 30, 2014, WNB ranked last out of 27 institutions with a nominal market share of 0.08 percent. Given the bank's deposit base, size and presence in this market, their level of lending is adequate.

#### **Distribution of Loans by Income Level of the Geography**

Overall, WNB's geographic distribution of loans is adequate. The geographic distribution of all three loan products, refinance loans, consumer loans and small loans to businesses is adequate.

##### ***Home Refinance Loans***

Refer to Table 4 in the Myrtle Beach AA section of Appendix D for the facts and data used to evaluate the geographic distribution of the bank's home mortgage loan refinance originations.

The geographic distribution of home refinance loans is adequate. However, we do recognize that this assessment is based on a total population of 25 loans and a few more or less loans in any tract would impact the conclusion.

For 2014/2015, the bank made no loans in low-income geographies therefore, the bank's lending performance is poor. However, 0.51 percent of this AA's owner-occupied housing units are located in low-income geographies which somewhat mitigates the bank's poor performance. Their distribution of loans in moderate-income tracts is near the percentage of owner-occupied housing units in these geographies, which demonstrates good performance.

The bank's 2014 market share is adequate. The bank made no loans in low-income tracts in 2014, which reflects poor performance. However, their refinance loan market share in moderate-income tracts is excellent as the bank's market share in these tracts exceeds their overall market share of loans in all tracts.

### ***Small Loans to Businesses***

Refer to Table 6 in the Myrtle Beach MMSA AA section of Appendix D for the facts and data used to evaluate the geographic distribution of the bank's small loans to businesses.

The geographic distribution of small loans to businesses is adequate. However, this assessment is based on a small population of 22 loans.

For 2014/2015, the distribution of small loans to businesses in low-income geographies is very poor as WNB made no loans in low-income tracts. Given that only 4.19 percent of this AA's businesses are located in these tracts, somewhat mitigates the bank's poor performance. Their distribution of small loans to businesses in moderate-income tracts is good as their distribution of loans is near the percentage of businesses in these geographies.

The bank's 2014 market share is adequate. While the bank made no loans in low-income tracts in 2014, their market share in moderate-income tracts is excellent. Their market share in moderate-income tracts exceeds their overall market share of loans in all tracts.

### ***Consumer Loans***

Refer to Table 13 in the Myrtle Beach AA section of Appendix D for the facts and data used to evaluate the geographic distribution of the bank's consumer loan originations.

The geographic distribution of consumer loans is adequate.

For 2014/2015, the bank's geographic distribution of consumer loans is adequate. The distribution of loans in low-income geographies is poor as WNB made no consumer loans in the low-income geographies. However, only 1.56 percent of this AA's households are located in these geographies which somewhat mitigates their poor performance. However, their distribution of loans in moderate-income geographies is good as the bank's distribution of loans is near the percentage of households in these tracts. Market share data is not available for consumer loans.

### ***Lending Gap Analysis***

A lending gap analysis was not performed for this AA, as the lending volume in the Myrtle Beach AA was insufficient to perform a meaningful analysis.

### **Distribution of Loans by Income Level of the Borrower**

Overall, WNB's distribution of loans by income level of the borrower is excellent. The bank's distribution of home refinance is good. The distribution of both consumer loans and small loans to businesses is excellent. As previously stated, more emphasis was given to the bank's consumer lending.

#### ***Home Refinance Loans***

Refer to Table 10 in the Myrtle Beach AA section of Appendix D for the facts and data used to evaluate the borrower distribution of the bank's home mortgage refinance loan originations.

The borrower distribution of the bank's home refinance loans to borrowers is good.

For 2014/2015, the distribution of loans to low-income families is lower than the percentage of low-income families in the AA and this reflects adequate performance. However, their distribution of loans to moderate-income families is excellent. Their distribution of loans to these families exceeds the demographic comparator. Their market share for 2014 is also good. Their market share to low-income borrowers is near their overall market share whereas their market share to moderate-income borrowers exceeds their overall market share.

#### ***Small Loans to Businesses***

Refer to Table 11 in the Myrtle Beach AA section of Appendix D for the facts and data used to evaluate the borrower distribution of the bank's small loans to businesses.

The borrower distribution of small loans to businesses is excellent.

The borrower distribution of small loans to businesses for 2014/2015 is excellent. The percentage of small loans to small businesses exceeds the percentages of these businesses. The bank's 2014 market share to small businesses is also excellent. Their market share of loans to small businesses exceeds their overall market share of loans to all businesses.

#### ***Consumer Loans***

Refer to Table 13 in the Myrtle Beach AA section of Appendix D for the facts and data used to evaluate the borrower income distribution of the bank's consumer loan originations.

The borrower income distribution of consumer loans is excellent.

For 2014/2015, the bank's distribution of loans to both low- and moderate-income households significantly exceeds the percentage of these type households in the AA. Market share data is not available for consumer loans.

## **Community Development Lending**

Refer to Table 1 Lending Volume in the Myrtle Beach AA section of Appendix D for the facts and data used to evaluate the bank's level of community development lending. This table includes all CD loans, including multifamily loans that qualified for CD purposes during the evaluation period.

CD lending had a neutral impact on lending performance in the Myrtle Beach AA. The bank originated 2 CD loans in this AA totaling \$125,000 or 20 percent of allocated Tier One Capital. The bank's community development loans were responsive to AA needs and provided financing to promote affordable housing, financial wellness, and community economic development to empower low-wealth families and communities. Affordable housing and down payment assistance were mentioned as important needs in the Myrtle Beach AA. This level of CD lending is adequate.

## **Product Innovation and Flexibility**

WNB has established a lending partnership with a nationwide mortgage lender in manner that ensures that a full array of mortgage financing products are available to serve the full market of qualified borrowers in the communities where the bank conducts business. These programs had a neutral impact on the bank's lending performance.

## **INVESTMENT TEST**

The bank's performance under the Investment Test for the Myrtle Beach AA is rated High Satisfactory. Based upon a full-scope review, the bank's performance in the Myrtle Beach multistate AA is good.

## **Conclusions for Areas Receiving Full-Scope Reviews**

Refer to Table 14 in Appendix D for the facts and data used to evaluate the bank's level of qualified investments.

The bank's level of CD investments is good. The opportunity to make CD investments in the Myrtle Beach AA is high. During the assessment period, WNB made six qualified investments in this AA, totaling \$479,000. The bank's investment amount represents 78 percent of allocated Tier One Capital.

Of this total, five investments were MBSs primarily secured by home mortgages to low- and moderate-income borrowers in the AA. WNB also made one grant for \$1,000 to a local community development organization that provides affordable housing and economic development services to low- to moderate- income individuals. The investments were not considered innovative or flexible in nature but did demonstrate a good responsiveness to meeting the affordable housing needs in the AA.

In addition, WNB has \$114,000 in an investment fund still outstanding from the prior period. These investments supported affordable housing for low- and moderate-income individuals and continues to have a positive impact on the AA.

## **SERVICE TEST**

The bank's performance under the Service Test in the Myrtle Beach AA is rated Low Satisfactory. Based on a full-scope review, the bank's performance is adequate.

### **Conclusions for Areas Receiving Full-Scope Reviews**

#### **Retail Banking Services**

Refer to Table 15 in the Myrtle Beach AA section of Appendix D for the facts and data used to evaluate the distribution of the bank's branch delivery system and branch openings and closings.

The bank's delivery systems are reasonably accessible to geographies and individuals of different income levels in the AA.

WNB operates three banking offices in the Myrtle Beach AA, all of which are located in Wal-Mart stores. Of these, none are located in low-income CTs and therefore the bank's branch distribution in these tracts is lower than the percentage of the population in those tracts. With 33.33 percent (1) of the bank's branches located in moderate-income CTs, the bank's percentage of branches exceeds the percentage of the population in the area. About 1.69 percent of the population resides in low-income tracts and 16.39 percent of the population in moderate-income tracts. Based on the low percentage of the population in the low-income areas, more emphasis was given to performance in the moderate-income areas in assessing the bank's overall performance in the full-scope AA.

The bank's record of opening and closing branches has not adversely affected the accessibility of delivery systems, particularly in low- or moderate-income geographies or to low- or moderate-income families in the area. During this evaluation period, there were no banking offices opened or closed in the AA.

#### **Community Development Services**

In the Myrtle Beach AA, WNB's record of providing CD services is adequate based on their resources and their responsiveness to identified needs in the community. We identified a significant number of non-profit organizations that operate in this AA.

During this evaluation period, WNB provided financial literacy training using the FDIC's Money Smart program and held classes totaling 119 hours for low- and moderate-income individuals in the area. In addition, there are three bank officers who serve as board or as committee members for affordable housing organizations and a local organization that provides services, such as health care, to low-or-moderate income individuals.

## Washington, D.C. Multistate MSA

**CRA rating for the Washington, DC MMSA<sup>6</sup>: Satisfactory**

**The Lending Test is rated: High Satisfactory**

**The Investment Test is rated: High Satisfactory**

**The Service Test is rated: Low Satisfactory**

The major factors that support this rating include:

- The overall level of lending is good. The geographic distribution of loans is excellent. The distribution of loans by borrower income level is also excellent.
- The level of CD loans is good.
- The level of CD investments is good.
- The bank's delivery systems are reasonably accessible to geographies and individuals of different income levels in the AA. The level of CD services is good.

### Description of Institution's Operations in the Washington, DC MMSA

With the OMB changes in 2014, the Washington, DC MMSA now consists of two MDs. Those MDs include the Washington-Arlington-Alexandria VA and Silver Spring-Frederick-Rockville MD. Prior to 2014, Silver Springs was part of the Bethesda-Rockville-Frederick MD.

We selected the Washington-Arlington-Alexandria VA MD (Washington AA) to receive a full-scope review and Silver Spring-Frederick-Rockville MD was selected for a limited-scope review.

Prior to the OMB changes, the bank's Washington AA was part of the state of VA AAs and with these changes the bank's AA now includes a new multi-state AA. WNB has eight branches in the Washington AA; seven in VA and one in MD. These branches are all non-traditional in-store offices located in Wal-Mart stores. The Washington AA represents 1 percent of the bank's branching network. Based on June 30, 2014 FDIC deposit information, WNB has a deposit market share of 0.01 percent in the Washington DC AA. The Washington AA represents 0.18 percent of the bank's total deposit base and has \$7 million in deposits in this AA.

Refer to the market profiles for the Washington AA in Appendix C for detailed demographics and other performance context information for AAs that received full-scope reviews.

### Scope of Evaluation in the Washington AA

The Washington AA was selected to receive a full-scope review. Prior to the OMB changes in 2014, the bank's Washington MSA was part of the state of Virginia.

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<sup>6</sup> This rating reflects performance within the multistate metropolitan area. The statewide evaluations do not reflect performance in the parts of those states contained within the multistate metropolitan area.



We reviewed the bank's 2012/2013 performance and concluded that their performance is not inconsistent with their 2014/2015 performance.

We performed a limited-scope review on the Silver Spring MD AA. Refer to the tables in Appendix D for more information on lending activity for the Washington AA.

## **LENDING TEST**

The bank's performance under the Lending Test in the Washington AA is rated High Satisfactory. Based on a full-scope review, the bank's performance in the AA is good.

## **Conclusions for Areas Receiving Full-Scope Reviews**

### **Lending Activity**

Refer to Table 1 Lending Volume in the Washington AA section of Appendix D for the facts and data used to evaluate the bank's lending activity.

The bank's overall volume of loans in the Washington AA is good. Lending levels are good considering the bank's size, capacity and presence in the market.

As a result of the OMB changes in 2014, the lending analysis only reflects 2014/2015 lending performance as the bank's AA changed from being a MSA to a multistate MSA. The bank made no home improvement, multifamily or small farm loans during this time frame. The bank did make one home purchase loan to a low-income borrower and 19 small loans to businesses, of which ten were to small businesses and three were made in moderate-income tracts. As a result, we did not analyze these loan products, as the bank did not make a sufficient volume of loans to perform a meaningful analysis.

During 2014/2015, WNB made 28 home mortgage refinance loans and 192 consumer loans. More emphasis was placed on consumer loans rather than the home mortgage refinance loans as consumer loans represent 80.33 percent of all loans originated in this AA. WNB is not a predominant home mortgage lender in this AA. For 2014, WNB ranked 192<sup>nd</sup> out of 506 lenders in making refinance loans in this AA with a market share of 0.05 percent.

With respect to deposit market share in this AA, as of June 30, 2014, WNB ranked 56 out of 57 institutions with a market share of 0.01 percent. Considering the bank's size, their deposit market share compared to their refinance market share and the number of consumer loans made, their level of lending activity is good.

### **Distribution of Loans by Income Level of the Geography**

Overall, WNB's geographic distribution of loans is excellent. The geographic distribution of both refinance and consumer loans is excellent. Lack of small business loans to perform an analysis had a neutral impact on the overall conclusions.

### ***Refinance Loans***

Refer to Table 4 in the Washington DC MMSA AA section of Appendix D for the facts and data used to evaluate the geographic distribution of the bank's home mortgage loan refinance originations.

The geographic distribution of home refinance loans is excellent. However, this assessment is based on a small population of refinance loans (28) which could skew the results a few more or less loans in any tract.

For 2014/2015, their distribution of refinance loans in both low- and moderate-income tracts exceeds the percentage of owner-occupied housing units in these geographies. The bank's market share in 2014 is also excellent. Their refinance market share in both low- and moderate-income tracts exceeds their overall market share of loans in all tracts.

### ***Consumer Loans***

Refer to Table 13 in the Washington AA section of Appendix D for the facts and data used to evaluate the geographic distribution of the bank's consumer loan originations.

The geographic distribution of consumer loans is excellent.

For 2014/2015, the bank's geographic distribution of consumer loans is excellent. The bank's distribution of loans in both low- and moderate-income geographies exceeds the percentage of households in these geographies. Market share data is not available for consumer loans.

### ***Lending Gap Analysis***

A lending gap analysis was not performed for this AA, as the lending volume in the Washington AA was insufficient to perform a meaningful analysis.

### **Distribution of Loans by Income Level of the Borrower**

Overall, WNB's distribution of loans by income level of the borrower is excellent. The borrower distribution of both home refinance and consumer loans is excellent.

### ***Refinance Loans***

Refer to Table 10 in the Washington AA section of Appendix D for the facts and data used to evaluate the borrower distribution of the bank's home mortgage refinance loan originations.

The distribution of the bank's home refinance loans to borrowers is excellent.

For 2014/2015, the distribution of home refinance loans to both low- and moderate-income families significantly exceeds the percentage of low- and moderate-income families in the AA. The bank's 2014 market share is excellent. Their refinance market share to both low- and moderate-income borrowers also exceeds their overall market share of loans to all borrowers.

## **Consumer Loans**

Refer to Table 13 in the Washington DC MMSA AA section of Appendix D for the facts and data used to evaluate the borrower income distribution of the bank's consumer loan originations.

The borrower income distribution of consumer loans is also excellent.

For 2014/2015, the bank's borrower income distribution of consumer loans is excellent. The bank's distribution of consumer loans to low- income households significantly exceeds the percentage of these households in the AA. The bank's distribution of consumer loans to moderate-income households is near the percentage of these households. In arriving at the overall conclusion, the magnitude of the bank's performance to low-income households was significant enough to compensate for their lesser moderate-income performance. Market share data is not available for consumer loans.

## **Community Development Lending**

Refer to Table 1 Lending Volume in the Washington DC MMSA AA section of Appendix D for the facts and data used to evaluate the bank's level of community development lending. This table includes all CD loans, including multifamily loans that qualified for CD purposes during the evaluation period.

Community development lending had a positive impact on lending performance in the Washington AA. The bank originated three CD loans in this AA totaling \$300,000 or 35 percent of allocated Tier One Capital. This level of CD lending is good.

Two loans totaling \$250,000 help fund micro-loans to small businesses and provide community development services for low- and moderate-income families in the AA. While these loans were not innovative or complex, the loans showed good responsiveness to meeting the identified credit needs in the AA. Revitalization and development of neighborhoods were mentioned as important needs in this AA with emphasis on affordable housing, healthcare and eldercare services.

One loan for \$50,000 was made to a foundation that promotes crime prevention for senior citizens. The primary objective of this foundation is to reduce crime in the nation's senior housing facilities and to provide ongoing, effective crime prevention programs that promote safe, secure and high quality of life environments for senior housing residents. WNB provided supporting documentation that shows the bank adjusted its community development strategy and changed the collateral with this foundation. The existing collateral of two Ginnie Mae MBS pools benefits LMI households. The loan funds help ensure a safe and secure crime-free residence to low- to moderate-income residents. The loan meets the regulatory definition of a CD loan.

## **Product Innovation and Flexibility**

WNB has established a lending partnership with a nationwide mortgage lender in manner that ensures that a full array of mortgage financing products are available to serve the full market of qualified borrowers in the communities where the bank conducts business. These programs had a neutral impact on the bank's lending performance.

## **Conclusions for Areas Receiving Limited-Scope Reviews**

Based upon the limited-scope review, the bank's overall performance in the Silver Spring AA is weaker than the bank's performance in the full-scope AA as the overall volume of loans made in this AA is significant lower. However, the bank's performance in the limited-scope AA had a neutral impact on the overall rating for this multistate AA because only 7.7 percent of the bank's deposits in this multistate AA are located within the limited-scope area. Therefore, the conclusions for the full-scope AA carried the overall ratings for this AA.

Refer to Tables 1 through 13 in Appendix D for this AA for the facts and data that support these conclusions.

## **INVESTMENT TEST**

The bank's performance under the Investment Test in the Washington AA is rated High Satisfactory. Based upon a full-scope review, the bank's performance is good.

## **Conclusions for Areas Receiving Full-Scope Reviews**

Refer to Table 14 in Appendix D for the facts and data used to evaluate the bank's level of qualified investments.

The level of CD investments is good. During this evaluation period, WNB made six qualified investments in this AA, totaling \$679,000 comprised primarily of grants, donations and two MBS. The bank's total investment amount represented 79 percent of allocated Tier One Capital. The bank has ample opportunity to make qualified CD investments in the Washington AA as we identified numerous community development organizations that operate in this AA.

The MBSs totaling \$524,000 were secured by home mortgages to low- and moderate-income borrowers in the AA. Four grants and donations, totaling \$155,000, provided support to a local organization that delivers community development services to low- to moderate-income individuals and to a national organization that provides training and technical assistance, research and policy analyses and other resources to community-based member organizations. The investments were not considered innovative or flexible in nature but were responsive to the affordable housing needs of the AA and the need to help stabilize the neighborhoods in the AA.

In addition, WNB has one investment for \$254,000 that is still outstanding from the prior evaluation period. This long-term equity investment supported affordable housing for low- and moderate-income individuals.

The investment was part of an investment fund and the projects earmarked for WNB. This investment and the resulting affordable housing units continue to have a positive impact on the AA.

## **Conclusions for Areas Receiving Limited-Scope Reviews**

Based on limited-scope reviews, the bank's performance under the Investment Test in the Silver Spring AA is weaker than the bank's performance in the full-scope as the dollar amount of investments was significantly less. However, the performance in the limited-scope AA was not significant enough to impact the overall conclusions for this rating area.

Refer to Table 14 in Appendix D for this multistate AA for the facts and data that support these conclusions.

## **SERVICE TEST**

The bank's performance under the Service Test in the Washington AA is rated Low Satisfactory. Based on a full-scope review, the bank's performance is adequate.

## **Conclusions for Areas Receiving Full-Scope Reviews**

### **Retail Banking Services**

Refer to Table 15 in the Washington AA section of Appendix D for the facts and data used to evaluate the distribution of the bank's branch delivery system and branch openings and closings.

The bank's delivery systems are reasonably accessible to geographies and individuals of different income levels in the AA.

WNB operates eight banking offices in the Washington AA, all of which are located in Wal-Mart stores. Of these, none are located in low-income CTs and therefore the bank's branch distribution in these tracts is significantly lower than the percentage of the population in the AA. About 5.53 percent of the population resides in low-income tracts. With 37.50 percent (3) of the branches located in moderate-income CTs, the bank's percentage of branches exceeds the percentage of the population in the area as 22.97 percent of the population in moderate-income tracts. Based on the low percentage of the population living in the low-income areas, more emphasis was given to performance in the moderate-income areas in assessing the bank's overall performance in the full-scope AA.

The bank's record of opening and closing branches has not adversely affected the accessibility of delivery systems, particularly in low- or moderate-income geographies or to low- or moderate-income families in the area. During this evaluation period, there was one banking office closed in the AA that was located in a middle-income CT.

## **Community Development Services**

In the Washington AA, WNB's record of providing CD services is good based on their resources and their responsiveness to identified needs in the community. We identified a significant number of non-profit organizations and CDFIs that operate in this AA.

During this evaluation period, WNB primarily provided financial literacy training using the FDIC's Money Smart program and held classes totaling 402 hours for low- and moderate-income individuals in the area. In addition, the bank had four employees serving as board or committee members for various nonprofits that provide services to low- and moderate-income families and affordable housing organizations.

## **Conclusions for Areas Receiving Limited-Scope Reviews**

Based on limited-scope reviews, the bank's performance under the Service Test in the Silver Spring-Frederick-Rockville MD is not inconsistent with the bank's overall performance in the state.

## State Rating

### State of Texas

**CRA Rating for the Texas: Satisfactory**

**The Lending Test is rated: High Satisfactory**

**The Investment Test is rated: Outstanding**

**The Service Test is rated: High Satisfactory**

The major factors that support this rating include:

- The overall level of lending is good. The geographic distribution of loans is adequate. The distribution of loans by borrower income level is good.
- The volume and quality of CD loans is excellent and helped to increase the Lending Test rating.
- The level of CD investments is excellent and the investments were highly responsive to the identified needs in the AA.
- Retail banking delivery systems are reasonably accessible to geographies and individuals of different income levels. The level of CD services is excellent and elevated the Service Test rating.

### Description of Institution's Operations in Texas

WNB's primary operations are in Texas. The OMB changes in 2014 resulted in the creation of four additional AAs in the state for the bank; the Austin, Amarillo, Beaumont and Brownsville/Harlingen MSA AAs. In 2014, the bank had 21 AAs in the state. WNB operates 203 traditional and in-store branches, primarily located in Wal-Mart and other retail stores. The bank's branch network in the other 16 states is exclusively in Wal-Mart stores. The state of Texas represents 27 percent of the bank's branching network and 86 percent of their deposit base as WNB has \$3.2 billion in deposits concentrated in the state.

Based on June 30, 2014 FDIC market share information, WNB is ranked twentieth in the state with a total deposit market share of 0.44 percent. Competition in the state is strong with 579 financial institutions with banking offices. Primary competition is provided by institutions with a large regional or national footprint such as JP Morgan Chase Bank, N.A., Bank of America, N.A., Wells Fargo Bank, N.A., USAA, FSB, and Compass Bank.

Refer to the market profiles for the state of Texas in Appendix C for detailed demographics and other performance context information for the AA that received a full-scope review.

### Scope of Evaluation in Texas

We selected two full-scope AAs to review in the state of Texas. These are Houston-The Woodlands-Sugar Land TX MSA (Houston AA), and San Antonio-New Braunfels MSA (San Antonio AA).

In selecting these full-scope areas we considered several factors including the bank's level of lending, development opportunities, bank's presence in the AA, and importance the AA is to the bank's operations in the rating area. More emphasis was given to the bank's performance in the Houston AA as this AA represents 91 percent of the state's deposits and 86 percent of the bank's total deposits.

The San Antonio AA represents 1.12 percent of the state's deposits and 0.97 percent of the bank's total deposits. The Houston AA has the most branches bank-wide with 105 or 14.02 percent of the total branches. The San Antonio AA has 19 branches or 2.54 percent. The state of Texas holds the most branches with 203 or 27.10 percent of the bank's 749 total branches.

Limited-scope reviews were performed for the Amarillo MSA, Austin-Round Rock MSA, Beaumont-Port Arthur MSA, Brownsville-Harlingen MSA, Cooke County, Dallas-Plano-Irving MD, East Texas Non-MSA, Fort Worth-Arlington MD, Gillespie County, Harrison County, Howard County, Longview MSA, Northeast Non-MSA, Shelby County, Sherman-Denison MSA, Southeast Non-MSA, Southern Non-MSA, Texarkana MSA, and Tyler MSA.

Consumer loans received the more emphasis in determining the overall rating for the Lending Test. WNB made more consumer loans than any other loan product; thereby, we gave more consideration to this product. Small loans to businesses and HMDA loans received equal emphasis. In terms of mortgage lending, refinance loans was given more consideration than the other loans products as the bank consistently made more refinance loans in the AAs than the other products. Excluding Texas, the bank is not a major home purchase or home improvement lender. Therefore, these products received less consideration in determining the bank's lending performance. In Texas, home purchase loans received more consideration than home improvement loans. Home improvement loans received the least emphasis of the three mortgage products. This emphasis is reflective of the bank's lending performance during this evaluation period and their overall business strategy.

Refer to the tables in Appendix D for more information on lending activity for the State of Texas.

## **LENDING TEST**

The bank's performance under the Lending Test in the state of Texas is rated High Satisfactory. Based on a full-scope review, the bank's performance is good in both the Houston and San Antonio AAs. CD lending activity in the Houston AA is excellent and these activities help to meet identified credit needs in the community. The bank's excellent CD lending activity in Houston AA increased the Lending Test rating. The bank's performance in the Houston AA drove the overall state rating.

## **Conclusions for Areas Receiving Full-Scope Reviews**

### **Lending Activity**

The bank's overall volume of loans in the state of Texas is good. The volume of lending activity in the Houston AA is good.



Whereas, the volume of lending activity is adequate in San Antonio. Our assessment considered the bank's size, their capacity and presence in the respective markets.

Refer to Tables 1 Lending Volume in the state of Texas section of Appendix D for the facts and data used to evaluate the bank's lending activity.

### Houston AA

During this evaluation period, WNB made 1,232 HMDA loans, 1,769 small loans to businesses, and 4,596 consumer loans. This volume of lending activity is good given the bank's size, resources and their deposit market share compared to their small business and HMDA market shares. The bank made nine small loans to farms and six multifamily loans during this evaluation period. Of the nine small loans to farms, all were made to small farms and of the six multifamily loans; one was located in a moderate-income geography. This does illustrate that the bank is willing to make these type loans. We did not analyze these loans products because the bank did not make a sufficient volume of loans to perform a meaningful analysis.

More consideration was placed on consumer loans than HMDA or small loans to businesses as consumer loans represent 60.51 percent of the primary loan products originated in this AA. HMDA loans and small loans to businesses received equal emphasis. In terms of individual HMDA products, refinance and home purchase loans received equal emphasis. Home improvement loans received the least emphasis of all three products. This consideration is reflective of the bank's lending performance during this evaluation period.

WNB is not a predominant home mortgage lender in this AA. In 2013, WNB was ranked 94 out of 755 lenders in home purchase loans (market share 0.13 percent), 15 out of 282 lenders in home improvement loans (market share of 1.17 percent), and 86 out of 708 lenders in refinance loans (market share of 0.17 percent) in this AA. WNB ranked 28 out of 170 lenders in making small loans to businesses in 2013 with a nominal market share 0.33 percent. Market share data is not available for consumer loans.

With respect to deposit market share in this AA, as of June 30, 2014, WNB ranked eleven out of 102 institutions with a nominal market share of 1.21 percent. When we compared the bank's deposit market share to their HMDA and small business market share, their lending activity is good.

### San Antonio AA

During this evaluation period, WNB made 66 home refinance mortgage loans, 157 small loans to businesses, and 907 consumer loans. The volume of lending is adequate given the bank's size and resources. The bank made one home purchase, two home improvement and no multifamily loans in this AA during the evaluation period. One of the home improvement loans was made to a moderate-income borrower. We could not analyze these loan products, as the bank did not make a sufficient volume of loans to perform a meaningful analysis.

More consideration was placed on consumer loans than home refinance loans or small business loans as consumer loans represent 80.27 percent of the primary loan products originated in this AA. The home refinance and small loans to businesses were given equal consideration.

WNB is not a predominant home mortgage lender in this AA. WNB was ranked 131 out of 483 lenders in making refinance loans in this AA in 2013 with a nominal market share of 0.16 percent. The bank ranked 36 out of 101 lenders in making small loans to businesses with a nominal market share 0.10 percent in 2013.

Based on June 30, 2014 FDIC market information, WNB ranked 40 out of 53 institutions with a nominal deposit market share of 0.04 percent. Considering the bank's deposit market share to their small business and refinance market share and the bank's size and resources, their level of lending in this AA is adequate.

### **Distribution of Loans by Income Level of the Geography**

Overall, WNB's geographic distribution of loans is adequate. The geographic distribution of HMDA loans is poor. Their distribution of small business loans is good. Their distribution of consumer loans is adequate. In arriving at the overall conclusion, more consideration was given the bank's consumer loan performance.

In terms of individuals HMDA products, their geographic distribution of both home purchase and home improvement loans is poor. Whereas, their distribution of refinance loans is good. In arriving at this conclusion, more emphasis was given to refinance and home purchase loans.

### **Home Mortgage Loans**

Refer to Tables 2 in the state of Texas section of Appendix D for the facts and data used to evaluate the geographic distribution of the bank's home purchase loan originations.

#### ***Home Purchase Loans***

##### *Houston AA*

The geographic distribution of home purchase loans in the Houston AA is poor.

For 2012/2013, the bank's geographic distribution of loans is very poor. Their distribution of loans in both low- and moderate-income tracts is significantly lower than the percentage of owner-occupied units. This reflects very poor performance. Their 2013 market share is also very poor. Based on 2013 market share data, the bank made no loans in low-income tracts and their market share in moderate-income tracts is significantly lower than their overall market share.

For 2014/2015, the bank's geographic distribution of loans is good. The bank's distribution of loans in low-income tracts is adequate as their distribution of loans is lower than the percentage of owner-occupied units in these tracts. However, in moderate income tracts, the bank's distribution of loans is good as it is near the demographic comparator.

The bank's 2014 market share is excellent as their market share in both low- and moderate-income tracts significantly exceeds their overall market share of home purchase loans in all CTs.

### ***Home Improvement Loans***

Refer to Table 3 in the state of Texas section of Appendix D for the facts and data used to evaluate the geographic distribution of the bank's home improvement originations.

#### *Houston AA*

The geographic distribution of home improvement loans in the Houston AA is also poor.

For 2012/2013, the bank's geographic distribution of loans is very poor. WNB made no loans in low-income tracts. This reflects very poor performance. In moderate-income tracts, the bank's distribution of loans is adequate as their percentage of loans is lower than the demographic comparator. The bank's 2013 market share performance is also very poor. WNB made no loans in low-income tracts; therefore, their market share is zero. In moderate-income tracts, the bank's market share is significantly lower than their overall market share.

For 2014/2015, the bank's geographic distribution of loans is also poor. In low-income tracts, the bank's distribution of loans is somewhat lower than the percentage of owner-occupied units in these tracts. This reflects poor performance. Whereas, the bank's distribution of loans in moderate-income tracts is adequate as their distribution of loans is lower than the demographic comparator. The bank's 2014 home improvement market share is adequate. The bank made no loans in low-income tracts in 2014. However, their market share in moderate-income tracts is near their overall market share of loans in all tracts, which reflects good performance.

### ***Home Refinance Loans***

Refer to Tables 4 in the state of Texas section of Appendix D for the facts and data used to evaluate the geographic distribution of the bank's home mortgage loan refinance originations.

The distribution of refinance loans in the Houston AA is good. Their distribution of loans in the San Antonio AA is adequate. The bank's performance in Houston carries more emphasis than their performance in San Antonio.

#### *Houston AA*

The geographic distribution of refinance loans in this AA is good.

For 2012/2013, the geographic distribution of loans is adequate. The distribution of loans in low-income tracts is poor. The bank's distribution of loans in these tracts is somewhat lower than the percentage of owner-occupied housing units in these geographies. However, the bank's distribution of loans in moderate-income tracts is adequate as their distribution of loans in these tracts is lower than the percentage of owner-occupied units in these geographies. However, the bank's 2013 market share performance is excellent.

WNB's market share in both low- and moderate-income tracts significantly exceeds their overall market share of loans in all tracts.

For 2014/2015, the geographic distribution of loans is excellent. Their distribution of loans in low-income tracts is near the percentage of owner-occupied units in these tracts. This reflects good performance. However, the bank's distribution of loans in moderate-income tracts is excellent as their distribution of loans exceeds the percentage of owner-occupied housing units in these geographies. In terms of market share, the bank's 2014 market share performance is excellent. In both low- and moderate-income tracts, the bank's market share exceeds their overall market share of refinance loans in all tracts.

### San Antonio AA

The geographic distribution of refinance loans in this AA is adequate. However, this assessment is based on a small population of loans for both evaluation periods; 41 loans for 2012/2013 and 25 loans for 2014/2015. We recognize that the difference in number of loans in the tracts is not that significant and performance conclusions are affected by only a few loans.

For 2012/2013, the geographic distribution is poor. The distribution of loans in low-income geographies is poor, as the bank did not originate any loans in low-income CTs. About 4.79 percent of the owner-occupied housing units in this AA are located in low-income geographies. The distribution of loans in moderate-income geographies is lower than the percentage of owner-occupied housing units in these geographies. Based on 2013 market share, the bank made no loans in low-income tracts. However, their market share in moderate-income tracts significantly exceeds their overall market share of loans in all tracts.

For 2014/2015, the geographic distribution is excellent. The distribution of loans in both low- and moderate-income geographies exceeds the number of owner-occupied housing units in these geographies. The bank's market share performance is also excellent. In 2014, the bank's refinance market share in both low- and moderate-income CTs exceeds their overall market share of refinance loans in all tracts.

### ***Small Loans to Businesses***

Refer to Tables 6 in the state of Texas section of Appendix D for the facts and data used to evaluate the geographic distribution of the bank's small loans to businesses.

Overall, the geographic distribution of small loans to businesses is good. The distribution of loans in the Houston AA is good. Whereas, the distribution of loans in San Antonio is adequate. The bank's performance in Houston carried more emphasis in arriving at the overall performance conclusion.

### Houston AA

The geographic distribution of small loans to businesses in this AA is good.

For 2012/2013, the geographic distribution is good. The bank's distribution of loans in both low- and moderate-income geographies is near the percentage of businesses in these geographies. This reflects good performance.

Their 2013 market share performance is also good. Based on 2013 market share, WNB's market share in both low- and moderate-income is near their overall market share of loans in all tracts.

For 2014/2015, the geographic distribution is good. Their distribution of loans in low-income geographies is lower than the percentage of businesses in these CTs. This reflects adequate performance. However, their distribution of loans in moderate-income tracts is excellent. The bank's distribution of loans in moderate-income geographies exceeds the percentage of businesses in these tracts. The bank's 2014 market share performance is good. Their market share in low-income tracts is lower than their overall market share, which reflects adequate performance. However, their market share in moderate-income tracts is excellent as it exceeds their overall market share of loans in all tracts.

### San Antonio AA

The geographic distribution of small loans to businesses in this AA is adequate. Poor lending level in 2012/2013 had a negative impact on the overall conclusion.

The bank originated six small loans to businesses for 2012/2013, of which two loans were made in moderate-income tracts. We did not evaluate the bank's lending performance, as the volume of loans was insufficient to perform a meaningful analysis. This had a negative impact on the performance conclusion for this loan category.

For 2014/2015, the geographic distribution of loans is excellent. Their distribution of loans in both low- and moderate-income geographies exceeds the percentage of businesses in these geographies. Based on 2013 market share information, WNB's market share in both low- and moderate-income tracts is excellent and their market share in these tracts exceeds their overall market share of loans in all tracts.

### **Consumer Loans**

Refer to Tables 13 in the state of Texas section of Appendix D for the facts and data used to evaluate the geographic distribution of the bank's consumer loan originations.

Overall, the bank's geographic distribution of consumer loans is adequate. The distribution of loans in the Houston AA is adequate and the distribution of loans in the San Antonio AA is good. More emphasis was given to the bank's performance in the Houston AA.

### Houston AA

The geographic distribution of consumer loans in this AA is adequate.

For 2012/2013, the geographic distribution is adequate. The distribution of loans in low-income tracts is poor as the bank's distribution of loans is somewhat lower than the percentage of households in these geographies. However, their distribution of loans in moderate-income tracts is good. The bank's distribution of loans in these tracts is near the demographic comparator. Market share data is not available for consumer loans.

For 2014/2015, the geographic distribution of loans is also adequate. Their distribution of loans in low-income tracts is lower than the percentage of households in these tracts. This reflects adequate performance. Whereas, in moderate-income tracts, their distribution of loans is excellent as it exceeds the percentage of households in these geographies. Market share data is not available for consumer loans.

### San Antonio AA

The geographic distribution of consumer loans in this AA is good.

For 2012/2013, the geographic distribution is good. Their distribution of loans in low-income tracts is excellent as it exceeds the percentage of low-income households in these geographies. However, their distribution of loans in moderate-income tracts is good. Their distribution of loans is near the percentage of households in moderate-income geographies. Market share data is not available for consumer loans.

For 2014/2015, the geographic distribution is excellent. The bank's distribution of loans in low-income tracts exceeds the percentage of low-income households in these geographies. In moderate-income tract's the bank's distribution of loans substantially equals the demographics. Market share data is not available for consumer loans.

### ***Lending Gap Analysis***

We analyzed WNB's lending distribution within the Houston and San Antonio AAs to determine if any unexplained, conspicuous gaps existed in the bank's home mortgage, small business, and consumer loan activity. We used lending distribution reports to identify geographies where the bank did not make any loans. We also reviewed the demographics of geographies where no loans were made. We considered loan distributions, branch locations, and demographic information. As a result of this analysis, no unexplained conspicuous gaps were found in the home mortgage, small business, or consumer loan lending activity.

### ***Inside/Outside Ratio***

A substantial majority of the bank's loans were made inside the AAs in the state of Texas. Overall, 95.93 percent of the bank's loans in the state of Texas were made inside the AAs in the state. By loan product, 98.46 percent of home refinance loans, 97.04 percent of small loans to business, and 95.47 percent of consumer loans were made inside WNB's AAs. This assessment is based on lending within this state rather than the entire bank. The percentage of lending in the state of Texas had a positive impact on the geographic distribution of loans in the AAs within the state.

### **Distribution of Loans by Income Level of the Borrower**

Overall, WNB's distribution of loans by borrower income level is good. The borrower distribution of HMDA loans is adequate as their distribution of home purchase and home improvement loans is adequate. Their distribution of refinance loans is good. In arriving at the overall conclusion for HMDA, refinance and home purchase loans received the most consideration.

The distribution of loans by income of the businesses is good. As previously stated, more consideration was given to the bank's consumer lending. The borrower distribution of consumer loans is excellent.

### ***Home Purchase Loans***

Refer to Tables 8 in the state of Texas section of Appendix D for the facts and data used to evaluate the borrower distribution of the bank's home purchase loan originations.

#### Houston AA

Overall, the distribution of home purchase loans is adequate.

For 2012/2013, the bank's distribution of loans is very poor. Their distribution of loans to both low- and moderate-income borrowers is significantly lower than the percentage of both low- and moderate-income families in the AA. This reflects very poor performance. In addition, their 2013 market share is also very poor. WNB's market share in both low- and moderate-income borrowers is significantly lower than their overall market share of loans to all borrowers.

For 2014/2015, the bank's distribution of loans is good. The bank's distribution of loans to low-income borrowers is very poor as their distribution of loans is significantly lower than the percentage of low-income borrowers in the AA. However, the bank's distribution of loans to moderate-income borrowers is excellent as it significantly exceeds the percentage of moderate-income families in the AA. In addition, the bank's 2013 market share is also excellent. Their market share to both low- and moderate-income borrowers exceeds their overall market share of home purchase loans to all borrowers.

### ***Home Improvement Loans***

Refer to Tables 9 in the state of Texas section of Appendix D for the facts and data used to evaluate the borrower distribution of the bank's home improvement loan originations.

#### Houston AA

Overall, the distribution of home improvement loans in the Houston AA is adequate.

For 2012/2013, the bank's distribution of loans is adequate. Their distribution of loans to low-income borrowers is significantly lower than the percentage of low-income families in the AA. This reflects very poor performance. Whereas, their distribution of loans to moderate-income borrowers is good as their percentage of loans substantially equals the percentage of moderate-income families in the AA. The bank's 2013 market share performance is excellent. WNB's market share to both low- and moderate-income borrowers significantly exceeds their overall market share of loans to all borrowers.

For 2014/2015, the bank's distribution of loans is also adequate. Their distribution of loans to low-income borrowers is significantly lower than the percentage of low-income families in the AA. This reflects very poor performance. However, their distribution of loans to moderate-income borrowers is good.

The bank's distribution of loans is near the percentage of moderate-income families in the AA. Based on 2014 market share information, the bank's performance is excellent. The bank's market share to both low- and moderate-income borrowers exceeds their overall market share of loans to all borrowers.

### ***Home Refinance Loans***

Refer to Tables 10 in the state of Texas section of Appendix D for the facts and data used to evaluate the borrower distribution of the bank's home mortgage refinance loan originations.

Overall, the distribution of refinance loans is good. The distribution of refinance loans in both the Houston and San Antonio AAs is good.

#### Houston AA

The distribution of home refinance loans by borrower income level is good.

For 2012/2013, the distribution of loans by borrower income is good. The distribution of loans to low-income families is significantly lower than the percentage of low-income families in the AA, which demonstrates very poor performance. However, the bank's distribution of loans to moderate-income families is excellent and their distribution of loans exceeds the percentage of moderate-income families in the AA. Also, the bank's 2013 market share performance is excellent. The bank's market share to both low- and moderate-income borrowers significantly exceeds their overall market share to all borrowers.

For 2014/2015, the borrower income distribution is good. Their distribution of loans to low-income families is adequate and is lower than the percentage of low-income families in the AA. However, their distribution of loans to moderate-income families is excellent as it exceeds the percentage of moderate-income families in the AA. The bank's 2014 market share performance is also excellent as their market share to both low- and moderate-income borrowers exceeds their overall market share of refinance loans to all borrowers.

#### San Antonio AA

The borrower income distribution of home refinance loans in this AA is good. The total population of loans reviewed in this AA is relatively small, 41 loans for 2012/2013 and 25 loans for 2014/2014. As a result, the number of loans in each performance category is not significantly different and the bank's performance would change with a few more or less loans in any category.

For 2012/2013, the borrower income distribution is good. The distribution of loans in low-income families is very poor as the bank's distribution of loans is significantly lower than the percentage of low-income families in the AA. Whereas, their distribution of loans to moderate-income families is excellent as it exceeds the percentage of moderate-income families. The bank's 2013 market share performance is good. WNB's market share to both low- and moderate-income borrowers exceeds their overall market share of loans to all borrowers.



For 2014/2015, the borrower income distribution is also good. Their distribution of loans to low-income families is near the percentage of low-income families in the AA, which reflects good performance. Whereas, their distribution of loans to moderate-income families is excellent and exceeds the percentage of moderate-income families. The bank's 2014 market share performance is also excellent. Their market share to both low- and moderate-income borrowers exceeds their overall market share of loans to all borrowers.

### ***Small Loans to Businesses***

Refer to Tables 11 in the state of Texas section of Appendix D for the facts and data used to evaluate the borrower distribution of the bank's small loans to businesses.

Overall, the bank's distribution of small loans to businesses is good. The distribution of small loans to businesses in the Houston AA is good. The distribution of loans in San Antonio is adequate. In arriving at the overall conclusion, the bank's performance in the Houston AA carried more emphasis than their performance in San Antonio.

#### Houston AA

The income distribution of small loans to businesses in this AA is good.

For 2012/2013, the bank's borrower distribution of small loans to businesses is good. The bank's distribution of small loans to businesses with gross annual revenue of \$1 million or less is near the percentages of these businesses in the AA. This reflects good performance. In addition, the bank's 2013 market share is excellent as their market share of small loans to businesses exceeds their overall market share to all businesses.

For 2014/2015, the bank's borrower distribution of small loans to businesses is excellent. Their distribution of small loans to businesses with gross annual revenue of \$1 million or less exceeds the percentages of these businesses in the AA. In 2013, the bank's market share of loans to small businesses significantly exceeds their overall market share of loans to all businesses.

#### San Antonio AA

The income distribution of small loans to businesses in this AA is adequate. Poor lending volume in 2012/2013 had a negative impact on the overall performance conclusion. The performance conclusion is a blend of the bank's performance in both analysis periods.

For 2012/2013, the bank made six small loans to businesses. Of this total, three loans were made to small businesses in this AA.

The distribution of small loans to businesses for 2014/2015 is excellent. Their distribution of small loans to businesses with gross annual revenue of \$1 million or less exceeds the percentages of these businesses in the AA. In addition, the bank's 2014 market share performance is excellent. The bank's market share of small loans to businesses exceeds their overall market share of loans to all businesses.

## **Consumer Loans**

Refer to Tables 13 in the state of Texas section of Appendix D for the facts and data used to evaluate the borrower income distribution of the bank's consumer loan originations.

Overall, the distribution of consumer loans is excellent. The distribution of loans in both the Houston and San Antonio AAs is excellent.

### Houston AA

The borrower income distribution of consumer loans in this AA is excellent.

For 2012/2013, the borrower income distribution is excellent. The distribution of loans in both low- and moderate-income households exceeds the percentage of low- and moderate-income households in the AA. Market share data is not available for consumer loans.

For 2014/2015, the borrower income distribution is also excellent. The bank's distribution of loans to both low- and moderate-income households exceeds the percentage of these households in the AA. Market share data is not available for consumer loans.

### San Antonio AA

The borrower income distribution of consumer loans in this AA is excellent.

For 2012/2013, the borrower income distribution is excellent. The distribution of loans to both low- and moderate-income households exceeds the percentage of low- and moderate-income households in the bank's AA. There is no market share for consumer loans.

For 2014/2015, the borrower income distribution is also excellent. The distribution of loans to both low- and moderate-income households exceeds the number of low- and moderate-income income households. Market share data is not available for consumer loans.

## **Community Development Lending**

Refer to Tables 1 Lending Volume in the state of Texas section of Appendix D for the facts and data used to evaluate the bank's level of community development lending. The totals on this table include all CD loans, including multifamily loans that qualified for CD purposes during the evaluation period.

The bank's CD lending activity in the Houston and San Antonio AAs is excellent and increased the Lending Test rating.

## Conclusions for Areas Receiving Full-Scope Reviews

### Houston AA

WNB's level of CD loans is excellent which increased the Lending Test rating. During this evaluation period, the bank made 23 loans for \$55.2 million in this AA. This lending volume represents 20 percent of allocated Tier One Capital. These loans were not considered innovative or complex. However, the bank's community development loans were highly responsive to AA needs, and supported affordable housing, community development services targeted to low- to moderate-income individuals and workforce development. Based on information received from current and past community contacts, these were identified as needs in the community and the bank responded to these needs in the following ways:

*Affordable Housing - \$32.9 million:* Nine loans totaling \$32.9 million were made for affordable housing. The bank made five CD loans totaling \$6 million to a variety of nonprofit community redevelopment corporations that provides housing to low- and moderate-income families. Purchased loan participations were used as an integral part of their CD lending operations. The bank partnered with a local financial institution to help fund four Low-Income Housing Tax Credit multifamily developments totaling \$26.9 million that produced 554 units of affordable rental housing.

*Community Development Services - \$6.3 million:* Eleven loans totaling \$6.3 million were made to nonprofit organizations that provide direct social and educational services to Montgomery County's economically disadvantaged children and adults, assist young adults who have aged out of the foster system and help women become economically self-sufficient.

WNB also made three loans totaling \$16 million to a foundation that promotes crime prevention for senior citizens. The primary objective of this foundation is to reduce crime in the nation's senior housing facilities and to provide ongoing, effective crime prevention programs that promote safe, secure and high quality of life environments for senior housing residents. WNB provided supporting documentation that shows the bank adjusted its community development strategy and changed the collateral with this foundation. The existing collateral of two Ginnie Mae MBS pools benefits LMI households. The loan funds help ensure a safe and secure crime-free residence to low- to moderate-income residents. The loan meets the regulatory definition of a CD loan.

### San Antonio AA

CD lending in the San Antonio MSA is excellent and helped to increase the Lending test rating. The bank originated two CD loans in the AA totaling \$5.4 million or 120 percent of allocated Tier One Capital. WNB provided a \$25,000 loan to help fund community development services for low- and moderate-income families in the AA and a \$5.4 million participation loan that helped to provide 144 affordable rental housing units. These loans were not considered innovative or complex but were highly responsive to the need for affordable housing in the AA. Affordable housing is an identified need in this AA and the bank responded to this need with an excellent level of CD lending activity.

## **Product Innovation and Flexibility**

WNB has established a lending partnership with a nationwide mortgage lender in manner that ensures that a full array of mortgage financing products are available to serve the full market of qualified borrowers in the communities where the bank conducts business. These programs had a neutral impact on the bank's lending performance.

## **Conclusions for Areas Receiving Limited-Scope Reviews**

Based on limited-scope reviews, the bank's overall performance in the Austin MSA, Dallas MSA, East Texas Non-MSA, and Fort Worth MSA AAs is not inconsistent with the bank's performance in the full-scope AA.

The bank's performance in the Amarillo MSA, Beaumont MSA, Brownsville MSA, Cooke County, Harrison County, Howard County, Longview MSA, Northeast Texas Non-MSA, Shelby County, Sherman MSA, Southeast Texas Non-MSA, Southern Texas Non-MSA, Texarkana and Tyler MSA AAs is weaker than the bank's performance in the full-scope AA. Weaker performance is primarily attributed to nominal lending activity and/or poorer distribution of loans especially to low- or moderate-income tracts or individuals. However, the performance in these areas was not significant enough to impact the overall Lending Test rating for the state as they represent 22.63 percent of the deposits for the state.

Refer to Tables 1 through 13 in the state of Texas section of Appendix D for the facts and data that support these conclusions.

## **INVESTMENT TEST**

WNB's performance under the Investment Test in Texas is rated Outstanding. Based upon the full-scope review, the bank's performance in both the Houston and San Antonio AAs is excellent.

## **Conclusions for Areas Receiving Full-Scope Reviews**

Refer to Table 14 in Appendix D for the facts and data used to evaluate the bank's level of qualified investments.

### Houston AA

In aggregate, current and outstanding prior period investments total \$55.2 million in the Houston AA and represent 19 percent of allocated Tier One Capital. These investments are not innovative or complex but were highly responsive to the needs in the AA. We identified affordable housing and workforce development as needs in this AA and the bank's responsiveness to meeting the identified credit needs of the community is excellent.

Based on community contacts made in this AA, there is ample opportunities to make CD investments in this AA and the responded to these opportunities by making qualified investments that support affordable housing, community services and projects that revitalize and stabilize the area.

During the evaluation period, WNB made 157 investments in the Houston AA totaling \$53.5 million. Of this total, WNB made 111 MBS investments that totaled \$14.2 million secured by mortgages to low- and moderate-income borrowers throughout the AA.

The remaining investments included the following:

- 33 grants and donations for \$11.4 million to organizations that provide community development and affordable housing services to low- and moderate-income individuals,
- Seven certificates of deposits for \$1.4 million with a local community development credit union and a local minority-owned bank,
- Three multifamily mortgage backed securities designated as a “Delegated Underwriting and Servicing” (DUS) for \$21.8 million. FNMA DUS securities are backed by affordable housing multifamily loan pools that usually consist of a single loan/single purpose entity.

DUS securities are comprised of first lien loans on new construction, or refinancing on income-producing properties; and

- Three municipal bonds for \$4.7 million that are designed to build and/or renovate public schools where the majority of the students at the schools qualify for free/reduced lunch assistance. The municipal bonds helped to revitalize and stabilize low-income areas in the Houston AA.

In addition, WNB still has outstanding three long-term debt and equity investments for \$1.7 million from prior periods. These investments supported small business and affordable housing loans in the AA and the investments continue to have a positive impact on the AA.

### San Antonio AA

The opportunity to make CD investments in the San Antonio AA is excellent. In the San Antonio AA, WNB made 16 investments totaling \$5.9 million. This investment amount represents 131 percent of allocated Tier One Capital. Given the opportunities in the AA and the banks’ responsiveness to these needs, the bank’s investment activities is excellent. The investments were not considered innovative or flexible in nature but were highly responsive to meeting the needs of the AA.

Examples of these investments follow:

- Five MBSs for \$615, 000 where the underlying home mortgages were made to low- and moderate-income borrowers in this AA.
- Three grants and donations for \$205,000 to local community organizations that provide small business development and community development services to low- to moderate-income individuals and geographic areas.
- Six certificate of deposits totaling \$604,000 with local minority-owned banks to help meet the credit needs in the AA.

- Two municipal bonds, totaling \$4.5 million, designed to build and/or renovate public schools where the majority of the students at the schools qualify for free/reduced lunch assistance. The municipal bonds helped to revitalize and stabilize low-income areas in the AA.

## Conclusions for Areas Receiving Limited-Scope Reviews

Based upon the limited-scope review, the bank's performance in the Amarillo AA, Austin AA, Beaumont-Port Arthur AA, Brownsville-Harlingen AA, Cooke County AA, Dallas-Plano-Irving AA, Fort Worth-Arlington AA, Harrison County AA, Howard County AA, Longview AA, Northeast Non-MSA AA, Shelby County AA, Sherman-Denison AA, Texarkana AA, and Tyler AA is not inconsistent with the bank's performance in the full-scope AA. The bank's investment percentages in these AAs equaled or exceeded the percentage of allocated Tier One capital in the full-scope AA.

In addition, WNB also had three prior period, long-term equity investments within the Dallas-Plano-Irving AA, totaling \$931,000 and a \$373,000 prior period, long-term equity investment within the Fort Worth-Arlington AA. The prior period investments continue to have a positive impact on the AAs.

However, the bank's investments in the East Texas Non-MSA AA, Gillespie County AA, Southeast Non-MSA AA and Southern Non-MSA AA is weaker than the bank's performance in the full-scope AAs as these investment percentages were significantly less. However, the bank made investments in all AAs and these AAs are primarily rural and therefore, the investment opportunities may be limited. The bank's performance in these limited-scope AAs was not significant enough to impact the overall rating for the state as they represent 1.81 percent of the state's total deposits.

## SERVICE TEST

The bank's performance under the Service Test in Texas is rated High Satisfactory. Based on full-scope reviews, the bank's performance in the Houston and San Antonio full-scope AAs is good. Excellent CD services in both full-scope AAs improved the bank's overall performance under the Service Test and increased the rating.

## Conclusions for Areas Receiving Full-Scope Reviews

### Retail Banking Services

Refer to Table 15 in the Texas AA section of Appendix D for the facts and data used to evaluate the distribution of the bank's branch delivery system and branch openings and closings.

#### Houston AA

In the Houston AA, WNB's delivery systems are reasonably accessible to geographies and individuals of different income levels.

The bank operates 105 banking offices in this AA. Of these, 5.71 percent (6) are located in low-income CTs and 21 percent are located in moderate-income CTs. In both low- and moderate-income CTs, WNB's branch distribution is lower than the percentage of the population in these tracts. The percentage of the population residing in low-income CTs is 9.36 percent and 26.07 percent for moderate-income CTs.

All in-store branches are open 7-days a week and the hours of operation vary, with opening times between 8 and 10 am to closing times between 4 and 6 pm, Monday through Friday. Saturday banking hours vary from 9 or 10 am until 4 or 6 pm. Banking hours on Sunday vary from 11 am until noon with closing hours between 4 or 5 pm. In the Houston AA, WNB has five branches in Wal-Mart stores that are open seven days per week and 24 hours per day.

Traditional branch hours vary market to market based on transaction volume and local demand. Generally, traditional branch hours are Monday through Thursday from 9 am to 5 pm and Friday from 9 am to 6 pm. WNB also offers Saturday lobby hours in the majority of traditional branches from 9 am to 2 pm. WNB's banking hours and services had a positive impact on their service performance in this and other AAs throughout the footprint.

The bank's record of opening and closing branches has not adversely affected the accessibility of delivery systems, particularly in low- or moderate-income geographies or to low- or moderate-income families in the area. During the evaluation period, the bank closed three banking offices and opened one. These closures were due to unprofitable performance, low customer traffic and the expiration of the lease contract. Two branch closings were located in middle-income CTs and one was located in an upper-income CT. One banking office was located on the campus of the University of Houston and the other two offices were instore banking facilities. In addition, one banking office was opened in an upper-income tract.

### San Antonio AA

In the San Antonio AA, WNB's delivery systems are reasonably accessible to geographies and individuals of different income levels.

There are 19 banking offices in this AA, all of which are located in Wal-Mart stores. None of the branches are located in low-income CTs. Therefore, the percentage of branches in low-income areas is significantly lower than the percentage of the population that resides in these tracts. Twenty-one percent (4) of the bank's branches are located in moderate-income tracts. This is lower than the percentage of the population residing in these tracts. The percentage of the population residing in low-income CTs is 7.12 percent and 29.35 percent for moderate-income CTs.

During the evaluation period, WNB opened one office in a middle-income tract. No banking offices were closed in this AA.

## **Community Development Services**

### *Community Development Services/Financial Literacy*

WNB provides banking and financial education classes free of charge to their customers. All branch managers are accredited to teach the FDIC Money Smart Curriculum.

Money Smart is a comprehensive financial education curriculum designed to help low- to moderate-income individuals outside the financial mainstream enhance their financial skills.

Utilizing primarily the FDIC Money Smart curriculum, WNB conducted approximately 46,000 hours of CRA qualified financial education bank-wide. In addition, bank employees serve in 667 positions as board or committee members of CD organizations bank-wide.

### Houston AA

WNB's record of providing CD services is excellent. We identified a significant number of non-profit organizations and CDFIs that operate in this AA.

Primary needs identified by WNB within the AA included financial literacy and board and committee membership on non-profit organizations. WNB responded in a significant way by providing in excess of 5,115 hours of financial literacy for low- to moderate-income individuals during the evaluation period. While these services were not innovative, they demonstrated a good responsiveness to meeting the identified needs of the community.

The bank's commitment to financial literacy is further demonstrated by the creation of an online financial education course called "Banking GPS". Banking GPS provides the customer with a financial education course, along with a certificate of completion. The customer can take the certificate to a branch and have either all of the overdraft charges for the first day refunded, or, if the account was not overdrawn, the customer can be credited a monetary bonus in a sweep account. Since 2012, the bank provided \$11.5 million in refunds to customers who have completed the course. However, the number of low- or moderate-income participants is unknown. Therefore, we could not give significant consideration to this activity.

In addition, bank employees held positions on boards and committees of approximately 48 non-profit organizations in the AA that provide various CD services and promote affordable housing and economic development.

Examples of the bank's involvement with non-profit organizations include the following:

- WNB is active with a non-profit that partners with faith organizations and community organizations to assist families with transitioning from homeless to stability and independence through compassionate guidance, shelter and education. WNB has six bank officers serving on board, financial literacy and committee member with these organizations.
- WNB is involved with a non-profit interfaith ministry that builds affordable homes for low- to moderate-income families. Nine bank officers are on the executive, family support or restore committee with this non-profit.
- WNB is active with an organization, through their various programs, that provides at risk youth from kindergarten to twelfth grade the skills to be successful in life. Sixteen bank officers serve in leadership positions with this non-profit including serving as a member of the board, vice chairperson, advisory committee or committee member.



- The bank's Chief Technology Officer led a team that provided technical assistance in the area of IT to rebuild a local food bank's computer systems and programs. As a result, the bank provided over 390 hours of IT service work to the food bank free of charge.

With regard to economic development, the bank provided assistance to "Super Communities" within the AA. In Houston, a "Super Community" is a geographically defined area where residents, civic organizations, institutions and businesses worked together to identify, plan and set priorities to address the needs and concerns of their community. The bank used "The City of Houston's Consolidated Plan", to identify 39 "Super Communities" and provided CD services to eight of these communities.

Examples of the type of financial services provided include: establishing partnerships with various non-profits, serving in leadership positions with non-profits, providing financial literacy, and assisting with grants and loans. WNB oftentimes took a leadership position to ensure that the credit needs of the community were met and these activities had a positive impact on the community.

### San Antonio AA

WNB's record of providing CD services is excellent based on their responsiveness to meeting the needs of the AA. We identified a significant number of qualified CD organizations that operate in this AA.

WNB employees taught in excess of 863 hours of financial literacy primarily using the FDIC's Money Smart curriculum for low- to moderate-income individuals. Additionally, WNB has bank officers that serve on boards or committees of non-profit organizations. Specific examples of these activities follow:

- Eight bank officers that serve on a non-profit that provides a caring home, education and support services for homeless teen mothers and their children. Employees serve on the fundraising and development committees.
- Three bank officers serve on the board or budgeting committee of a non-profit that raises funds that are distributed to area agencies addressing health and human service needs.
- Two officers also serve as a financial advisor and on the fundraising committee for two organizations that provide services to low- and moderate-income children that are abused, neglected and displaced.

WNB has also partnered with a non-profit micro- and small business lender to increase their community development impact. The organization's mission is to provide credit and services to small businesses and entrepreneurs who do not have access to loans from commercial sources, and to provide leadership and innovation to the micro lending industry. WNB's focus areas are to increase micro and small business lending, increase community education, and increase community presence through outreach activities.

## **Conclusions for Areas Receiving Limited-Scope Reviews**

Based on limited-scope reviews, the performance in the Cooke County, East Texas Non-MSA, Harrison County, and Shelby County is stronger than the performance in the bank's overall performance in the full-scope AAs. The stronger performance is attributable to a stronger branch distribution in the low- and moderate-income tracts. These AAs represent 1.27 percent of the state's total deposits.

Performance in Amarillo MSA, Austin-Round Rock MSA, Beaumont-Port Arthur MSA, Brownsville-Harlingen MSA, Dallas-Plano-Irving MSA, Fort Worth-Arlington MSA, Gillespie County, Howard County, Longview MSA, Northeast Non-MSA, Sherman-Denison MSA, Southeast Non-MSA, Southern Non-MSA, Texarkana MSA and Tyler MSA is weaker than the performance in the full-scope AAs. The weaker performance is attributable to a weaker branch distribution particularly in the low- and moderate-income tracts.

However, we also considered the fact that in some AAs the bank had only one banking office located in a Wal-Mart store and this limits the geographic distribution of their services. These AAs represent 7.53 percent of the state's total deposits. Overall, performance in the limited-scope areas did not impact the overall state rating.

## State of Alabama

**CRA Rating for Alabama: Satisfactory**  
**The Lending Test is rated: Low Satisfactory**  
**The Investment Test is rated: Outstanding**  
**The Service Test is rated: Low Satisfactory**

The major factors that support this rating include:

- The overall level of lending is adequate. Geographic distribution of loans is good. Distribution by borrower income level is good.
- The level of CD loans was adequate.
- The level of CD investments is excellent.
- The bank's delivery systems are reasonably accessible to geographies and individuals of different income levels in the AA. The level of CD services is adequate.

### Description of Institution's Operations in Alabama

WNB has a small presence in the state and is ranked 161 out of 170 institutions with a deposit market share of 0.03 percent. WNB has 41 branches throughout the state and this represents 5 percent of the bank's branching network. The bank has deposits of \$24 million in the state, which represents 0.65 percent of the bank's deposit base.

WNB has 11 AAs in the state including the Anniston-Oxford-Jacksonville MSA, Birmingham-Hoover MSA, Cullman and Marshall Counties, Daphne-Fairhope-Foley MSA, Decatur MSA, Huntsville MSA, Mobile MSA, Montgomery MSA, Southern Non-MSA and the Tuscaloosa MSA. The Cherokee County AA was eliminated as an AA after a branch closure in October 2013.

Refer to the market profiles for the State of Alabama in Appendix C for detailed demographics and other performance context information for AAs that received full-scope reviews.

### Scope of Evaluation in Alabama

We selected one AA in the state to perform a full-scope review, the Huntsville MSA. The Huntsville AA represents 15 percent of WNB's branching network in the state and 11 percent of its total deposit base. Performance in this area was given more emphasis than performance in limited-scope AAs.

Limited-scope reviews were performed for Anniston-Oxford-Jacksonville MSA, Birmingham-Hoover MSA, Cullman and Marshall Counties, Daphne-Fairhope-Foley MSA, Decatur MSA, Mobile MSA, Montgomery MSA, Southern Non-MSA and the Tuscaloosa MSA.

Refer to the tables in Appendix D for more information on lending activity for the State of Alabama.

## **LENDING TEST**

The bank's performance under the Lending Test in the state of Alabama is rated Low Satisfactory. Based on a full-scope review, the bank's performance in the Huntsville AL MSA AA is adequate.

## **Conclusions for Areas Receiving Full-Scope Reviews**

### **Lending Activity**

Refer to Tables 1 Lending Volume in the state of Alabama section of Appendix D for the facts and data used to evaluate the bank's lending activity.

The bank's overall volume of loans in the Huntsville AA is adequate. Lending levels are adequate considering the bank's size, capacity and presence in the market as the bank has a small deposit base and branching network in this AA.

During this evaluation period, WNB made 55 home refinance loans and 157 consumer loans. The bank made no home purchase, multifamily, or small loans to farms. The bank did make one home improvement loan and nine small loans to businesses.

More emphasis was placed on consumer loans than home refinance loans as consumer loans represent 70.72 percent of all loans originated in this AA. WNB is not a predominant home mortgage lender in this AA. In 2013, WNB was ranked 71 out of 247 lenders in overall market share for total home refinance loans in the Huntsville AA. WNB had nominal total market share of 0.16 percent.

With respect to deposit market share in this AA, as of June 30, 2014, WNB ranked last out of 27 institutions with a nominal market share of 0.04 percent. When we compared the bank's refinance market share to their deposit market share, the bank's lending activity is adequate.

### **Distribution of Loans by Income Level of the Geography**

Overall, WNB's geographic distribution of loans is good. The geographic distribution of refinance loans is poor. The distribution of consumer loans is excellent. As previously stated, more emphasis was given to the bank's consumer lending.

#### ***Home Refinance Loans***

Refer to Tables 4 in the state of Alabama section of Appendix D for the facts and data used to evaluate the geographic distribution of the bank's home refinance loan originations.

The geographic distribution of refinance loans is poor.

For 2012/2013, the bank's geographic distribution of loans is poor. During this evaluation period, WNB made no loans in low-income geographies. This had a negative impact on the overall conclusion.

The distribution of loans in moderate-income geographies is somewhat lower than the percentage of owner-occupied units in these geographies and this also reflects poor performance. Based on 2013 market share information, the bank made no loans in low-income tracts, therefore, their market share was zero. Their market share in moderate-income tracts is lower than their overall market share of loans in all tracts.

For 2014/2015, the bank's geographic distribution of loans is adequate. During this evaluation period, WNB made no loans in low-income geographies. This reflects poor performance and had a negative impact on the overall conclusion for this area. However, the bank's distribution of loans in moderate-income geographies is near the percentage of owner-occupied units in these geographies. The bank's 2014 market share is poor. In low-income tracts, WNB made no loans in 2014. In moderate-income tracts, their market share is lower than their overall market share of loans in all tracts.

### ***Small Loans to Businesses***

Refer to Table 6 in the state of Alabama section of Appendix D for the facts and data used to evaluate the geographic distribution of the bank's small loans to businesses.

While the volume of loans made during this evaluation period was not sufficient to perform a meaningful analysis, we reviewed the bank's distribution of these loans. Of the nine loans made, none were made in low-income tracts and three were made in moderate-income tracts. This demonstrates that the bank is willing to make the loan products available in moderate-income tracts.

### ***Consumer Loans***

Refer to Tables 13 in the state of Alabama section of Appendix D for the facts and data used to evaluate the geographic distribution of the bank's consumer loan originations.

The geographic distribution of consumer loans is excellent.

For 2012/2013, the bank's geographic distribution of consumer loans is excellent. The distribution of loans in both low- and moderate-income geographies exceeds the percentage of households in these geographies. Market share data is not available for consumer loans.

For 2014/2015, the bank's geographic distribution of consumer loans is excellent. The distribution of loans in both low- and moderate-income geographies exceeds the percentage of households in these geographies.

### ***Lending Gap Analysis***

We analyzed WNB's lending distribution within the Huntsville AA to determine if any unexplained, conspicuous gaps existed in the bank's home mortgage and consumer loan activity.

We used lending distribution reports to identify geographies where the bank did not make any loans. We also reviewed the demographics of geographies where no loans were made. We considered loan distributions, branch locations, and demographic information. As a result of this analysis, no unexplained conspicuous gaps were found in either the home mortgage or consumer loan lending activity.

### ***Inside/Outside Ratio***

A substantial majority of the bank's loans in the state of Alabama were made inside the bank's AAs. Overall, 92.6 percent of the bank's loans in the state of Alabama were made inside their AAs. By loan product, 98.4 percent of HMDA loans and 91.3 percent of consumer loans were made inside WNB's AAs. This assessment was based on lending within this state rather than the entire bank. The percentage of lending in this AA was a neutral factor in the overall analysis of the Lending Test.

### **Distribution of Loans by Income Level of the Borrower**

Overall, WNB's distribution of loans by income level of the borrower is good. The borrower distribution of home refinance loans is adequate. The distribution of consumer loans is excellent. As previously stated, more emphasis was given to the bank's consumer lending.

#### ***Home Refinance Loans***

Refer to Tables 10 in the state of Alabama section of Appendix D for the facts and data used to evaluate the borrower distribution of the bank's home mortgage refinance loan originations.

The borrower distribution of refinance loans is adequate.

For 2012/2013, the bank's borrower distribution of loans is adequate. The bank's distribution of loans to low-income families is near the percentage of low-income families in the AA. However, their distribution of loans to moderate-income families is somewhat lower than the percentage of moderate-income families, which reflects poor performance. In terms of market share, the bank's 2013 market share is adequate. Their market share to low-income borrowers significantly exceeds their overall market share of loans to all borrowers. Whereas, their market share to moderate-income borrowers is significantly lower than their overall market share.

For 2014/2015, the bank's borrower distribution of loans is good. The bank's distribution of loans to low-income families exceeds the percentage of low-income families in the AA. Their distribution of loans to moderate-income families is near the percentage of moderate-income families, which reflects good performance. The bank's market share in 2014 is excellent. Their market share of loans to both low- and moderate-income borrowers exceeds their overall market share of loans to all borrowers.

#### ***Small Loans to Businesses***

Refer to Table 11 in the state of Alabama section of Appendix D for the facts and data used to evaluate the borrower distribution of the bank's small loans to businesses.

Of the nine loans made during this evaluation period, eight were made to small businesses. While the volume of loans was not sufficient to perform a meaningful analysis, we reviewed the disposition of the loans in this AA.

### **Consumer Loans**

Refer to Tables 13 in the state of Alabama section of Appendix D for the facts and data used to evaluate the borrower income distribution of the bank's consumer loan originations.

The borrower distribution of consumer loans is excellent.

For 2012/2013, the bank's borrower distribution of consumer loans is excellent. The distribution of loans to both low- and moderate-income households exceeds the percentage of low- and moderate-income households in the AA. Market share data is not available for consumer loans.

For 2014/2015, the bank's borrower distribution of consumer loans is also excellent. The distribution of loans to both low- and moderate-income households exceeds the percentage of these type households in the AA.

### **Community Development Lending**

Refer to Tables 1 Lending Volume in the state of Alabama section of Appendix D for the facts and data used to evaluate the bank's level of community development lending. The combined totals on these tables include all CD loans, including multifamily loans that qualified for CD purposes during the evaluation period.

Community development lending had a positive impact on lending performance in the Huntsville AA. The bank originated two CD loans in the AA totaling \$70,000 or 18 percent of allocated Tier One Capital.

The bank's community development loans were responsive to AA needs, and supported financing for real estate development financing, nonprofit facilities loans, technical assistance, and development services in low- and moderate-income neighborhoods. Construction loans, home improvement loans, financial education for low- to moderate-income individuals and financial support for community development activities in the AA were mentioned as important needs. This level of CD lending is adequate.

### **Product Innovation and Flexibility**

WNB has established a lending partnership with a nationwide mortgage lender in manner that ensures that a full array of mortgage financing products are available to serve the full market of qualified borrowers in the communities where the bank conducts business. These programs had a neutral impact on the bank's lending performance.

## Conclusions for Areas Receiving Limited-Scope Reviews

Based on limited-scope reviews, the bank's overall performance in the Anniston MSA, Birmingham MSA, Cullman and Marshall Counties, Daphne MSA, Decatur MSA, Mobile MSA, Montgomery MSA, Southern AL Non-MSA, and Tuscaloosa MSA AAs is not inconsistent with their performance in the full-scope AA.

Refer to Tables 1 through 13 in the state of Alabama section of Appendix D for the facts and data that support these conclusions.

## INVESTMENT TEST

WNB's performance under the Investment Test in Alabama is rated Outstanding. Based upon a full-scope review, the bank's performance in the Huntsville AA is excellent.

## Conclusions for Areas Receiving Full-Scope Reviews

Refer to Table 14 in Appendix D for the facts and data used to evaluate the bank's level of qualified investments. Investment totals for the entire evaluation period are included in this table.

The bank's level of CD investments is excellent based on the volume of investments made and the responsiveness to community credit needs. During the evaluation period, WNB made four investments in the Huntsville AA totaling approximately \$396,000. This represents 100 percent of allocated Tier One Capital for the full-scope AA.

WNB's qualified investments were comprised entirely of MBSs secured by mortgages of low- and moderate-income borrowers in the AA. The investments were not considered innovative or flexible in nature but were responsive to the affordable housing needs of the AA.

WNB made no grants or donations to local organizations that provide community development services in this AA.

## Conclusions for Areas Receiving Limited-Scope Reviews

Overall, the bank's performance in the limited-scope AAs is not inconsistent with performance in the full-scope AA, with the exception of the Anniston-Oxford-Jacksonville AA, Daphne-Fairhope-Foley AA, Mobile AA, Southern Non MSA AA and the Tuscaloosa AA.

WNB's performance in the Anniston-Oxford-Jacksonville AA, Daphne-Fairhope-Foley AA, Mobile AA, Southern Non MSA AA and the Tuscaloosa AA is weaker than performance in the Huntsville AA. The dollar amount of investments in these AAs was less than in the full-scope AA. The combined performance in these limited-scope AAs is not significant enough to impact the overall rating for the state as they represent 35.27 percent of the deposits in the state.

Refer to Table 14 in Appendix D for this state for the facts and data that support these conclusions.



## SERVICE TEST

The bank's performance under the Service Test in Alabama is rated Low Satisfactory. Based on a full-scope review, the bank's performance in the Huntsville MSA AA is adequate.

## Conclusions for Areas Receiving Full-Scope Reviews

### Retail Banking Services

Refer to Table 15 in the Alabama AA section of Appendix D for the facts and data used to evaluate the distribution of the bank's branch delivery system and branch openings and closings.

The bank's delivery systems are reasonably accessible to geographies and individuals of different income levels in the AA.

WNB operates six banking offices in the Huntsville MSA AA, all of which are located in Wal-Mart stores. Of the six banking offices, none are located in low-income CTs and therefore the bank's branch distribution in these tracts is significantly lower than the percentage of the population in the area. However, 8.34 percent of the population resides in low-income CTs. With 33.34 percent (2) of the locations in moderate-income CTs, the bank's percentage of branches exceeds the percentage of the population in the area as 25.71 percent of the population in moderate-income tracts. The majority of the population, approximately 65.95 percent, resides in middle- and upper-income CTs.

Access to the bank's delivery systems is increased with banking offices that are reasonably close to low-or moderate-income tracts. Of the six banking offices in this AA, all six are within five miles of 20 of the 26 moderate-income tracts and four offices are within five miles of all low-income tracts.

Two branches were opened during this evaluation period, one in a middle-income and the other in a moderate-income CT. No branches were closed. The branch openings and closings have not adversely impacted low- and moderate-income individuals or CTs in the AA.

### Community Development Services

In the Huntsville AA, WNB's record of providing CD services is adequate based on their responsiveness to the identified needs of the AA. We identified several non-profit organizations that operate in this AA. During this evaluation period, WNB primarily provided financial literacy training using the FDIC's Money Smart program and held classes totaling 186 hours for low- and moderate-income individuals in the area through various organizations. Four employees serve as directors or committee members for four CD organizations in the AA. Specific examples are as follows:

- Serve as the financial literacy program director and on the financial education committee of an organization for a local food bank and distribution center.

- Provided financial education and served on the board of a non-profit that provided mentoring services to underprivileged youth from single-parent families.

## **Conclusions for Areas Receiving Limited-Scope Reviews**

Based on limited-scope reviews, the bank's performance under the Service Test in the Anniston-Oxford-Jacksonville MSA, Birmingham-Hoover MSA, Decatur MSA, Mobile MSA, Southern Non-MSA, and Tuscaloosa MSA is not inconsistent with the bank's overall performance in the full-scope AA. These AAs represent 59.78 percent of the state's total deposits.

Performance in the Montgomery MSA is stronger than the bank's performance in the full-scope AA. The stronger performance is attributable to a stronger branch distribution in the low- and moderate-income tracts. Performance in Cullman and Marshall Counties and Daphne-Fairhope-Foley MSA is weaker than the bank's in the full-scope AA due to weaker branch distribution in low- and moderate-income tracts. The performance in the limited-scope AAs was not significant enough to impact the overall rating for the state.

During the evaluation period, there was one branch office closed and one branch office opened in the limited-scope review areas. The closed office was located in an upper- income tract. This closure was due to unprofitable performance, low customer traffic and the expiration of the lease contract. The office opened was located in a moderate- income tract. The branch openings and closings have not adversely affected the accessibility of delivery systems, particularly in low- or moderate-income geographies or to low- or moderate-income families in the area.

## State of Florida

**CRA Rating for Florida: Satisfactory**  
**The Lending Test is rated: Low Satisfactory**  
**The Investment Test is rated: High Satisfactory**  
**The Service Test is rated: Low Satisfactory**

The major factors that support this rating include:

- The overall level of lending is adequate. The geographic distribution of loans is adequate. The distribution of loans by borrower income level is good.
- The volume of CD loans is adequate.
- The volume of CD investments is good.
- The bank's delivery systems are reasonably accessible to geographies and individuals of different income levels in the AA. The level of CD services is adequate.

### **Description of Institution's Operations in Florida**

WNB has three branches in the state of Florida. The state of Florida represents 0.40 percent of the bank's branching network and 0.10 percent of their deposit base as the bank has \$3.8 million in deposits in the state. WNB has a small presence in the state and is ranked number 261 out of 267 institutions with a deposit market share of 0.00 percent based on FDIC market share information as of June 30, 2014.

WNB had four AAs in the state including the Jacksonville MSA, Pensacola-Ferry Pass-Brent MSA, Ocala MSA, and the Tampa-St. Petersburg-Clearwater MSA. The bank closed banking offices during this evaluation period in three of the four AAs and presently the Jacksonville MSA is the bank's only AA in the state.

Refer to the market profiles for the State of Florida in Appendix C for detailed demographics and other performance context information for AAs that received full-scope reviews.

### **Scope of Evaluation in Florida**

We selected Jacksonville AA for full-scope review. The Jacksonville AA represents 100 percent of Florida's branching network and deposit base. However, since the branches in the Pensacola, Ocala and Tampa AAs were closed during this evaluation period, we performed a limited-scope review on these areas.

Refer to the tables in Appendix D for more information on lending activity for the State of Florida.

## **LENDING TEST**

The bank's performance under the Lending Test in the state of Florida is rated Low Satisfactory. Based on a full-scope review, the bank's performance in the Jacksonville FL MSA AA is adequate.

### **Conclusions for Areas Receiving Full-Scope Reviews**

#### **Lending Activity**

Refer to Tables 1 Lending Volume in the state of Florida section of Appendix D for the facts and data used to evaluate the bank's lending activity.

The bank's overall volume of loans in the Jacksonville AA is adequate. Lending levels are adequate considering the bank's size, capacity and presence in the market. The bank has a limited presence in this market with a small deposit base and limited branch network.

During this evaluation period, WNB made 51 home refinance loans and 71 consumer loans. The bank made no home purchase, multifamily or small farm loans during this evaluation period. The bank did make 2 home improvement and 12 small loans to businesses. While the bank did not make a sufficient volume of these loans to perform a meaningful analysis, we reviewed the geographic distribution and income dispersion of these loans in the AA.

We placed more emphasis on consumer loans rather than the home refinance loans as consumer loans represent 61.11 percent of all loans originated in this AA. WNB is not a predominant home mortgage lender in this AA. In 2013, WNB was ranked 53 out of 288 lenders in overall market share for total home refinance loans in the Jacksonville AA. WNB had nominal total market share of 0.17 percent.

With respect to deposit market share in this AA, as of June 30, 2014, WNB ranked 27 out of 29 institutions with a market share of 0.00 percent. When we compared the bank's refinance market share and their deposit market share, the bank's lending activity is adequate.

#### **Distribution of Loans by Income Level of the Geography**

Overall, WNB's geographic distribution of loans is adequate. The geographic distribution of refinance loans is poor. The distribution of consumer loans is good. As previously stated, more emphasis was given to the bank's consumer lending.

##### ***Home Improvement Loans***

Of the two loans made in this AA, one was made in a moderate-income tract.

##### ***Home Refinance Loans***

Refer to Tables 4 in the state of Florida section of Appendix D for the facts and data used to evaluate the geographic distribution of the bank's home refinance loan originations.

The geographic distribution of refinance loans is poor.

For 2012/2013, the bank's geographic distribution of loans is poor. During this evaluation period, WNB made no loans in low-income geographies, which reflects very poor performance, and this had a negative impact on the conclusion for this area. In addition, the bank's distribution of loans in moderate-income geographies is lower than the percentage of owner-occupied units in these geographies. This performance reflects adequate performance. Based on 2013 market share, WNB made no loans in low-income tracts however, their lending in moderate-income tracts exceeds their overall market share of loans in all tracts.

For 2014/2015, the bank's geographic distribution of loans is also adequate. During this evaluation period, WNB made no loans in low-income geographies. This reflects very poor performance. However, the bank's distribution of loans in moderate-income geographies exceeds the percentage of owner-occupied units in these geographies. Based on 2014 market share information, WNB's market share performance is adequate. The bank made no loans in low-income tracts in 2014, which reflects very poor performance. However, in moderate-income tracts, the bank's market share significantly exceeds their overall market share of loans in all tracts.

### ***Small Loans to Businesses***

Refer to Table 6 in the state of Florida section of Appendix D for the facts and data used to evaluate the geographic distribution of the bank's small loans to businesses.

Of the 12 loans made in this AA, one was made in a low-income tract and five were made in a moderate-income tract.

### ***Consumer Loans***

Refer to Tables 13 in the state of Florida section of Appendix D for the facts and data used to evaluate the geographic distribution of the bank's consumer loan originations.

The geographic distribution of consumer loans is good. While the bank's performance in 2014/2015 was excellent, poor performance in 2012/2013 had a negative impact. However, since the bank began offering this product in 2013, more emphasis was given to their 2014/2015 performance.

For 2012/ 2013, the bank made 13 loans in this AA. Of this total, three were made in low-income tracts and five were made in moderate-income tracts.

For 2014/2015, the bank's geographic distribution of consumer loans is excellent. The distribution of loans in both low- and moderate-income geographies exceeds the percentage of households in these geographies. Market share data is not available for consumer loans.

### ***Lending Gap Analysis***

A lending gap analysis was not performed for this AA, as the lending volume, 162 mortgage, small business and consumer loans during the review period, in the Jacksonville AA was insufficient to perform a meaningful analysis.

### ***Inside/Outside Ratio***

A majority of the bank's loans in the state of Florida were made inside the AA. Overall, 88.8 percent of the bank's loans in the state of Florida were made inside their AA. By loan product, 97.60 percent of HMDA loans, 90.13 percent of consumer loans and 58.70 percent of small loan to businesses were made inside WNB's AAs. This assessment was based on lending within this state rather than the entire bank. The percentage of lending in this AA was a neutral factor in the overall analysis of the Lending Test.

### **Distribution of Loans by Income Level of the Borrower**

Overall, WNB's distribution of loans by income level of the borrower is good. The borrower distribution of home refinance loans is good. As previously stated, more emphasis was given to the bank's consumer lending. The borrower distribution of consumer loans is good.

#### ***Home Improvement Loans***

Of the two loans made in this AA, one was made to a low-income borrower.

#### ***Home Refinance Loans***

Refer to Tables 10 in the state of Florida section of Appendix D for the facts and data used to evaluate the borrower distribution of the bank's home mortgage refinance loan originations.

The borrower distribution of refinance loans is good.

For 2012/2013, the bank's borrower distribution of loans is good. The bank's distribution of loans to low-income families is somewhat lower than the percentage of low-income families in the AA. However, their distribution of loans to moderate-income families significantly exceeds the percentage of moderate-income families. In addition, the bank's market share is excellent. In 2013, the bank's market share to low-income borrowers is near their overall market share. Whereas, their moderate-income market significantly exceeds their overall market share.

For 2014/2015, the bank's borrower distribution of loans is excellent. The distribution of loans to low-income families is near the percentage of low-income families in the AA. However, the bank's distribution of loans to moderate-income families significantly exceeds the percentage of moderate-income families in the AA. The magnitude of the bank's performance in the moderate-income tracts was significant enough to compensate for the lower performance in the low-income tracts. WNB's 2014 market share performance is also excellent. The bank's refinance market share to both low- and moderate-income borrowers exceeds their overall market share of loans to all borrowers.

#### ***Small Loans to Businesses***

Refer to Table 11 in the state of Florida section of Appendix D for the facts and data used to evaluate the borrower distribution of the bank's small loans to businesses.

The bank made 12 small loans to businesses in this AA. Eleven of the loans were made to small businesses.

### **Consumer Loans**

Refer to Tables 13 in the state of Florida section of Appendix D for the facts and data used to evaluate the borrower income distribution of the bank's consumer loan originations.

The borrower distribution of consumer loans is good. More emphasis was given to the bank's 2014/2015 performance rather than 2012/2013 performance. WNB introduced this product in May 2013 therefore 2014/2015 is a more accurate depiction of their lending performance.

For 2012/2013, the bank's borrower distribution of consumer loans was not evaluated because of insufficient loan volume.

For 2014/2015, the bank's borrower distribution of consumer loans is excellent. The distribution of loans to both low- and moderate-income households exceeds the percentage of low-income households. Market share data is not available for consumer loans.

### **Community Development Lending**

Refer to Tables 1 Lending Volume in the state of Florida section of Appendix D for the facts and data used to evaluate the bank's level of community development lending. The combined totals on these tables include all CD loans, including multifamily loans that qualified for CD purposes during the evaluation period.

Community development lending had a neutral impact on lending performance in the Jacksonville AA. The bank originated two CD loans in the AA totaling \$20,000 or 15 percent of allocated Tier One Capital. The loans provided financing for community development services, in low- and moderate-income neighborhoods. These loans help meet identified community development needs in the AA. This level of CD lending is adequate.

### **Product Innovation and Flexibility**

WNB has established a lending partnership with a nationwide mortgage lender in manner that ensures that a full array of mortgage financing products are available to serve the full market of qualified borrowers in the communities where the bank conducts business. These programs had a neutral impact on the bank's lending performance.

### **Conclusions for Areas Receiving Limited-Scope Reviews**

Based on limited-scope reviews, the bank's overall performance in the Pensacola MSA and Tampa/St. Petersburg MSA AAs is not inconsistent with the bank's performance in the full-scope AA. The bank's performance in the Ocala MSA AA is weaker than the bank's performance in the full-scope area. The Ocala MSA represent 21.71 percent of the deposits in the state and the weaker performance can be attributed to nominal lending activity in the AA as minimal presence the bank has in this AA, with only one branch. However, the Ocala MSA performance was not significant enough to impact the overall Lending Test rating for the state.

Refer to Tables 1 through 13 in the state of Florida section of Appendix D for the facts and data that support these conclusions.

## **INVESTMENT TEST**

WNB's performance under the Investment Test in Florida is rated High Satisfactory. Based upon a full-scope review, the bank's performance in the Jacksonville AA is good.

### **Conclusions for Areas Receiving Full-Scope Reviews**

Refer to Table 14 in Appendix D for the facts and data used to evaluate the bank's level of qualified investments. Investment totals for the entire evaluation period are reflected on this table.

The bank's level of CD investments is good based on the opportunities in the AA and the bank's volume of investments made. The bank has ample opportunity to make qualified CD investments in the Jacksonville AA. During the evaluation period, WNB made five investments in the Jacksonville AA totaling approximately \$334,000. This represents 244 percent of allocated Tier One Capital for the full-scope AA.

WNB's qualified investments were comprised of 3 grants or donations for \$9,000 to organizations that provide community services to low-and moderate-income individuals and two MBSs for \$325,000 secured by mortgages to low- and moderate-income individuals in the AA. These investments were not considered innovative or flexible in nature but were responsive to the needs of the AA.

### **Conclusions for Areas Receiving Limited-Scope Reviews**

Based on limited-scope reviews, the bank's performance under the Investment Test in Ocala AA and Pensacola-Ferry Pass- Brent AA limited-scope AAs is not inconsistent with performance in the full-scope AA.

WNB's performance in the Tampa-St. Petersburg-Clearwater AA is weaker than performance in the Jacksonville AA. The bank's investments in this AA are significantly less than their investment in the full-scope AA. The combined performance in the limited-scope AAs was not significant enough to impact the overall rating for the state.

Refer to Table 14 in Appendix D for this state for the facts and data that support these conclusions.

## **SERVICE TEST**

The bank's performance under the Service Test in Florida is rated Low Satisfactory. Based on a full-scope review, the bank's performance in the Jacksonville MSA AA is adequate.



## **Conclusions for Areas Receiving Full-Scope Reviews**

### **Retail Banking Services**

Refer to Table 15 in the Florida AA section of Appendix D for the facts and data used to evaluate the distribution of the bank's branch delivery system and branch openings and closings.

The bank's delivery systems are reasonably accessible to geographies and individuals of different income levels in the AA.

WNB operates three banking offices in the Jacksonville MSA AA, all of which are located in Wal-Mart stores. Of these, none are located in low-income CTs and therefore the bank's branch distribution in these tracts is significantly lower than the percentage of the population in the area. The bank's delivery systems are reasonably accessible to these low-income tracts as all three banking offices are located within a five mile radius of at least six low-income tracts and at least 33 of the 49 moderate-income tracts.

With 66.66 percent (2) of the locations in moderate-income CTs, the bank's percentage of branches exceeds the percentage of the population in the area. About 7.14 percent of the population resides in low-income tracts and 24.63 percent of the population in moderate-income tracts. The majority of the population, approximately 68.23 percent, resides in middle- and upper-income CTs. Because of the low population levels in the low-income geographies, more emphasis was given to the performance in the moderate-income geographies in assessing overall performance in the full-scope AA.

### **Community Development Services**

In the Jacksonville AA, WNB's record of providing CD services is adequate based on their responsiveness to meeting the identified needs in the AA. We identified some non-profit organizations that operate in this AA. During this evaluation period, WNB primarily provided financial literacy training using the FDIC's Money Smart program.

WNB held several classes and provided 130 hours of financial literacy training for low- and moderate-income individuals in the area to various organizations. In addition, three employees serve on the board or as a committee member for a local homeless shelter and for local youth development organizations that primarily benefit LMI students.

## **Conclusions for Areas Receiving Limited-Scope Reviews**

During the evaluation period, there were three banking offices closed in the limited-scope review areas. These closures were due to unprofitable performance and low customer traffic. Of these, one was located in an upper- income tract and two were located in middle- income tracts. These closures resulted in the elimination of the Ocala MSA, Pensacola-Ferry Pass-Brent MSA, and the Tampa-St. Petersburg-Clearwater MSA AAs.

## State of Georgia

**CRA Rating for Georgia: Satisfactory**  
**The Lending Test is rated: Low Satisfactory**  
**The Investment Test is rated: High Satisfactory**  
**The Service Test is rated: High Satisfactory**

The major factors that support this rating include:

- The overall level of lending is adequate. The geographic distribution of loans is good. The distribution of loans by borrower income level is good.
- The volume of CD loans is adequate.
- The volume of CD investments is good.
- The bank's delivery systems are readily accessible to geographies and individuals of different income levels in the AA. The level of CD services is good.

### Description of Institution's Operations in Georgia

WNB has eight branches in the State of Georgia. The State of Georgia represents 1.07 percent of the bank's branching network and 0.11 percent of their deposit base. Based on 2014 FDIC information, the bank has \$4.2 million in deposits in the state and is ranked 251 out of 259 institutions. WNB has a small presence in the state and has a deposit market share of 0.00 percent according to 2014 FDIC market share information.

WNB had two AAs in the state including the Atlanta-Sandy Springs-Roswell MSA (Atlanta), and the Macon MSA. The Macon MSA was eliminated as an AA in March 2015 because of a branch closure.

Refer to the market profiles for the State of Georgia in Appendix C for detailed demographics and other performance context information for AAs that received full-scope reviews.

### Scope of Evaluation in Georgia

We selected the Atlanta AA for a full-scope review. The Atlanta AA now represents 100 percent of the Georgia's branching network and deposit base. While the bank closed the branch in the Macon AA during this evaluation period, we still performed an analysis of the bank's performance in this limited-scope AA. Performance in the Atlanta full-scope AA was given more emphasis than performance in limited-scope AAs.

Refer to the tables in Appendix D for more information on lending activity for the State of Georgia.

## **LENDING TEST**

The bank's performance under the Lending Test in the state of Georgia is rated Low Satisfactory. Based on a full-scope review, the bank's performance in the Atlanta AA is adequate.

### **Conclusions for Areas Receiving Full-Scope Reviews**

#### **Lending Activity**

The bank's overall volume of loans in the Atlanta AA is adequate. Lending levels are adequate considering the bank's size, capacity and presence in the market. The bank has eight branches in the AA and the competition is strong.

Refer to Tables 1 Lending Volume in the state of Georgia section of Appendix D for the facts and data used to evaluate the bank's lending activity.

During this evaluation period, WNB made 93 home mortgage refinance loans, 39 loans to small businesses, and 246 consumer loans. The bank made no multifamily or small farm loans. The bank did make two home purchase, two home improvement and three small loans to businesses. While the bank did not make a sufficient volume of these type loans to perform a meaningful analysis, we did review the distribution of these loans.

More emphasis was placed on consumer loans than refinance loans or small loans to businesses as consumer loans represent 65.08 percent of all loans originated in this AA. Refinance and small loans to businesses were given equal emphasis. WNB is not a predominant home mortgage lender in this AA. In 2013, WNB was ranked 100 out of 504 lenders in overall market share for total home mortgage refinance loans in the Atlanta AA. WNB had nominal total market share of 0.08 percent. In 2013, WNB made no small loans to businesses in this AA; therefore their market share is zero.

With respect to deposit market share in this AA, as of June 30, 2014, WNB ranked 64 out of 69 institutions with a market share of 0.00 percent. When we compare the bank's deposit market share to their refinance market share, the bank's lending activity is adequate.

#### **Distribution of Loans by Income Level of the Geography**

Overall, WNB's geographic distribution of loans is good. The geographic distribution of refinance loans is good. The geographic distribution of small loans to businesses is adequate. As previously stated, more emphasis was given to the bank's consumer lending. The geographic distribution of consumer loans is excellent.

#### ***Home Purchase Loans***

Of the two loans made, none were in low- or moderate tracts. However, this volume of loans is not sufficient to perform a meaningful analysis.

***Home Improvement Loans***

Of the two home improvement loans made during this evaluation period, one loan was made in a moderate-income tract. However, the volume of loans made was not sufficient to perform a meaningful analysis.

***Home Refinance Loans***

Refer to Table 4 in the state of Georgia section of Appendix D for the facts and data used to evaluate the geographic distribution of the bank's home mortgage loan refinance originations.

The geographic distribution of refinance loans is good.

For 2012/2013, the bank's geographic distribution of loans is good. The distribution of loans in low-income geographies exceeds the percentage of owner-occupied units in these geographies. Whereas, the bank's distribution of loans in moderate-income tracts is near the percentage of owner-occupied units in these geographies. The bank's market share in 2013 is excellent. In both low- and moderate-income tracts, the bank's market share exceeds their overall market share of loans in all tracts.

For 2014/2015, the bank's geographic distribution of loans is excellent. Their distribution of loans in both low- and moderate-income geographies exceeds the percentage of owner-occupied units in these geographies. The bank's market share in 2014 is also excellent. The bank's market share in both low- and moderate-income tracts exceeds their overall market share of loans in all tracts.

***Small Loans to Businesses***

Refer to Tables 6 in the state of Georgia section of Appendix D for the facts and data used to evaluate the geographic distribution of the bank's small loans to businesses.

The geographic distribution of loans to small loans to businesses is adequate. Poor lending levels in 2012/2013 had a negative impact on the overall conclusion for this area. The conclusion is a blend of the bank's performance in both analysis periods.

For 2012/2013, the bank made three loans. Two of the three loans were made in a low-income tract. However, the volume of loans is not sufficient to perform a meaningful analysis.

For 2014/2015, the bank's geographic distribution of small loans to businesses is excellent. The distribution of small loans to businesses in both low- and moderate-income tracts exceeds the percentage of businesses in these geographies. The bank's market share is also excellent. In 2014, the bank's market share in both low- and moderate-income tracts exceeds their overall market share of loans in all tracts.

***Consumer Loans***

Refer to Tables 13 in the state of Georgia section of Appendix D for the facts and data used to evaluate the geographic distribution of the bank's consumer loan originations.

The geographic distribution of consumer loans is excellent. In arriving at the overall conclusion, more emphasis was given to the bank's 2014/2015 performance.

For 2012/2013, the bank's geographic distribution of consumer loans is good. The distribution of loans in low-income tracts is near the percentage of households in these geographies. The distribution of loans in moderate-income tracts exceeds the percentage of households in these geographies. Market share data is not available for consumer loans.

For 2014/2015, the bank's geographic distribution of consumer loans is excellent. The distribution of loans in both low- and moderate-income geographies exceeds the percentage of households in these geographies.

### ***Lending Gap Analysis***

We analyzed WNB's lending distribution within the Atlanta AA to determine if any unexplained, conspicuous gaps existed in the bank's home mortgage, small business, and consumer loan activity. We used lending distribution reports to identify geographies where the bank did not make any loans.

We also reviewed the demographics of geographies where no loans were made. We considered loan distributions, branch locations, and demographic information. As a result of this analysis, no unexplained conspicuous gaps were found in the home residential mortgage, small business, or consumer loan lending activity.

### ***Inside/Outside Ratio***

A majority of the bank's loans in the state of Georgia were made inside the AAs. Overall, 87.9 percent of the bank's loans in the state of Georgia were made inside their AAs. By loan product, 97.9 percent of HMDA loans, 79.6 percent of small business loans, and 85.9 percent of consumer loans were made inside WNB's AAs. This assessment was based on lending within this state rather than the entire bank. The percentage of lending in this AA was a neutral factor in the overall analysis of the Lending Test.

### **Distribution of Loans by Income Level of the Borrower**

Overall, WNB's distribution of loans by income level of the borrower is good. The borrower distribution of home refinance loans is good. The borrower distribution of small loans to businesses is adequate. The borrower distribution of consumer loans is excellent. As previously stated, more emphasis was given to the bank's consumer lending.

### ***Home Purchase Loans***

The bank made two loans in this AA during the evaluation period. No loans were made to either low- or moderate-income borrowers.

### ***Home Improvement Loans***

Of the two home improvement loans made during this evaluation period, one was made to a low-income borrower and the other made to a moderate-income borrower. This demonstrates that the bank is willing to make loans to these type of borrowers.

### ***Home Refinance Loans***

Refer to Tables 10 in the state of Georgia section of Appendix D for the facts and data used to evaluate the borrower distribution of the bank's home mortgage refinance loan originations.

The borrower income distribution of refinance loans is good.

For 2012/2013, the bank's borrower distribution of loans is good. The distribution of loans to low-income families is lower than the percentage of low-income families in the AA. This reflects poor performance. However, the bank's distribution of loans to moderate-income families exceeds the percentage of moderate-income families in the AA. In addition, their 2013 market share is excellent. In 2013, the bank's market share to both low- and moderate-income borrowers significantly exceeds their overall market share.

For 2014/2015, the bank's borrower distribution of loans is excellent. The distribution of loans to low-income families exceeds the percentage of low-income families. The distribution of loans to moderate-income families exceeds the percentage of moderate-income families. The bank's market share performance is also excellent. In 2014, their market share of loans to both low- and moderate-income borrowers exceeds their overall market share of loans to all borrowers.

### ***Small Loans to Businesses***

Refer to Tables 11 in the state of Georgia section of Appendix D for the facts and data used to evaluate the borrower distribution of the bank's small loans to businesses.

The borrower distribution of small loans to businesses is adequate. Poor performance in 2012/2013 had a negative impact on the overall conclusion for this area.

For 2012/2013, the bank made three loans, two of which were made to small businesses. However, the loan volume was not sufficient to perform a meaningful analysis.

For 2014/2015, the bank's borrower distribution of loans is excellent. WNB's dispersion of small loans to businesses exceeds the percent of small businesses in the AA. In addition to meeting the need for smaller dollar loans, the bank is also making loans to small businesses. Based on 2014 market share, WNB's market share to small businesses exceeds their market share of loans to all businesses.

### ***Consumer Loans***

Refer to Tables 13 in the state of Georgia section of Appendix D for the facts and data used to evaluate the borrower income distribution of the bank's consumer loan originations.

The borrower distribution of consumer loans is excellent.

For 2012/2013, the bank's borrower distribution of consumer loans is excellent. The distribution of loans to both low- and moderate-income households exceeds the percentage of low- and moderate-income households in the AA. Market share data is not available for consumer loans.

For 2014/2015, the bank's borrower distribution of consumer loans is also excellent. The distribution of loans to both low- and moderate-income households exceeds the percentage of these households. Market share data is not available for consumer loans.

### **Community Development Lending**

Refer to Tables 1 Lending Volume in the state of Georgia section of Appendix D for the facts and data used to evaluate the bank's level of community development lending. The combined totals on these tables include all CD loans, including multifamily loans that qualified for CD purposes during the evaluation period.

Community development lending had a neutral impact on lending performance in the Atlanta AA. The bank originated six CD loans in the AA totaling \$69,000 or 11 percent of allocated Tier One Capital. This level of CD lending is adequate. These loans were not considered complex or innovative. Three of the loans totaling \$39,000 were made to organizations that provide community development services to low- and moderate-income individuals in the AA. The remaining three loans were made to a foundation for crime prevention for senior citizens.

The primary objective of this foundation is to reduce crime in the nation's senior housing facilities and to provide ongoing, effective crime prevention programs that promote safe, secure and high quality of life environments for senior housing residents. WNB provided supporting documentation that shows the bank adjusted its community development strategy and changed the collateral with this foundation. The existing collateral of two Ginnie Mae MBS pools benefits LMI households. The loan funds help ensure a safe and secure crime-free residence to low- to moderate-income residents. The loan meets the regulatory definition of a CD loan.

### **Product Innovation and Flexibility**

WNB has established a lending partnership with a nationwide mortgage lender in manner that ensures that a full array of mortgage financing products are available to serve the full market of qualified borrowers in the communities where the bank conducts business. These programs had a neutral impact on the bank's lending performance.

### **Conclusions for Areas Receiving Limited-Scope Reviews**

Based on limited-scope reviews, the bank's performance under the Lending Test in the Macon MSA is weaker than the bank's performance in the full-scope AA as the bank's lending levels were significantly lower in the limited-scope AA. However, the bank's poor performance in the Macon AA did not impact the overall state rating as the Macon AA represented a small portion of the loans and deposits in the state.

Refer to the Tables 1 through 13 in the state of Georgia section of Appendix D for the facts and data that support these conclusions.

## **INVESTMENT TEST**

The bank's performance under the Investment Test for Georgia is rated High Satisfactory. Based upon a full-scope review, the bank's performance in the Atlanta AA is good.

### **Conclusions for Areas Receiving Full-Scope Reviews**

Refer to Table 14 in Appendix D for the facts and data used to evaluate the bank's level of qualified investments. Investment totals for the entire evaluation period are included in this table.

The bank has ample opportunity to make qualified CD investments in the Atlanta AA. During the evaluation period, WNB made ten investments in the Atlanta AA totaling \$301,000. This represented approximately 48 percent of allocated Tier One Capital for the full-scope AA. This level of investments is good based on the dollar amount of investments made and the ample opportunities to make these investments in the AA.

WNB's qualified investments were comprised of six grants and donations totaling \$19,000 to qualified CD organizations that provide community services to low- and moderate-income families, three certificate of deposits totaling \$150,000 with a local minority-owned bank, and one MBS for \$132,000 where the underlying mortgages were made to low- and moderate-income borrowers.

These investments were not innovative or flexible but did address some of the affordable housing and community service needs in the AA.

### **Conclusions for Areas Receiving Limited-Scope Reviews**

Based on limited-scope review, the bank's performance under the Investment Test in the Macon MSA is weaker than the bank's performance in the full-scope AA. The dollar amount of investments made in this AA was significantly less than those made in the full-scope AA. The limited-scope AA represents 12.01 percent of the bank's deposit in the state. The performance in the limited-scope AA was not significant enough to impact the overall rating for the state.

Refer to Table 14 in Appendix D for the facts and data used to evaluate the bank's level of qualified investments.

## **SERVICE TEST**

The bank's performance under the Service Test in Georgia is rated High Satisfactory. Based on a full-scope review, the bank's performance in the Atlanta AA is good.



## Conclusions for Areas Receiving Full-Scope Reviews

### Retail Banking Services

Refer to Table 15 in the Georgia AA section of Appendix D for the facts and data used to evaluate the distribution of the bank's branch delivery system and branch openings and closings.

The bank's delivery systems are accessible to geographies and individuals of different income levels in the AA.

WNB operates eight banking offices in the Atlanta AA, all of which are located in Wal-Mart stores. Of these, 12.50 percent (1) are located in low-income CTs and therefore the bank's branch distribution in these tracts exceeds the percentage of the population in the AA as 9.90 percent of the population live in low-income tracts. With 27.50 percent (3) of the locations in moderate-income CTs, the bank's branch distribution exceeds the percentage of the population in the area with 24.65 percent of the population in moderate-income tracts. Also, the other four banking offices are located within five miles of several low- and moderate-income tracts, which could increase the accessibility of the bank's services to these areas. The majority of the population, approximately 65.26 percent, resides in middle- and upper-income CTs.

There were no branches opened or closed in the Atlanta AA during this evaluation period. Therefore, the bank's branch opening and closing have not adversely affected the accessibility of delivery systems, particularly in low- or moderate-income geographies or to low- or moderate-income families in the area.

### Community Development Services

In the Atlanta AA, WNB's record of providing CD services is good based on their responsiveness to meeting the credit needs of the community. We identified a significant number of non-profit organizations and CDFIs that operate in this AA.

During this evaluation period, WNB primarily provided financial literacy training using the FDIC's Money Smart program and held classes totaling 478 hours for low- and moderate-income individuals in the area. This level of training demonstrate good responsiveness to addressing the financial literacy needs in the AA.

In addition, the bank had seven employees serving as board or committee members for various nonprofits, including a local food bank and organizations that provide housing and community services to low- and moderate-income individuals. Some specific examples follow:

- Two bank employees serve on the loan committee for a CDFI that provides low interest rate loans, financial education and support to working families with challenging credit histories.
- Two bank employees serve on the board for a homeless shelter.

- Serve as a board member and on a fundraising committee for an organization that provides assistance to families in poverty and are at risk of homelessness.

### **Conclusions for Areas Receiving Limited-Scope Reviews**

During the evaluation period, one banking office was closed in the limited-scope review area. This office was located in a middle- income tract. This branch was closed due to unprofitable performance and low customer traffic. This branch closure did result in the elimination of the Macon MSA AA.

## State of Illinois

**CRA Rating for Illinois: Needs to Improve**  
**The Lending Test is rated: Low Satisfactory**  
**The Investment Test is rated: Low Satisfactory**  
**The Service Test is rated: Needs to Improve**

The major factors that support this rating include:

- The overall level of lending is adequate. The geographic distribution of loans is adequate. The distribution of loans by income level is adequate.
- The level of CD loans is good.
- The level of CD investments is adequate.
- The bank distribution of banking offices in a significant number of limited-scope AAs was weaker and therefore decreased the Service Test rating for the state. The level of CD services is adequate.

### Description of Institution's Operations in Illinois

WNB has 36 branches in the State of Illinois. The State of Illinois represents 5 percent of the bank's branching network and 1.25 percent of their deposit base. The bank has deposits of \$46 million in the state. WNB has a small presence in the state and is ranked number 477 out of 590 institutions with a deposit market share of 0.01 percent.

WNB has 16 AAs in the state including the Bloomington MSA, Carbondale-Marion MSA, Central Non-MSA, Champaign-Urbana MSA, Coles County, Crawford County, Danville MSA, Davenport-Moline-Rock Island MSA, Decatur MSA, Kankakee MSA, Northern Non-MSA (Northern IL), Peoria MSA, Rockford MSA, St. Louis MSA, Southern Non-MSA, and the Springfield MSA.

Refer to the market profiles for the State of Illinois in Appendix C for detailed demographics and other performance context information for AAs that received full-scope reviews.

### Scope of Evaluation in Illinois

We selected one AA in the state to perform a full-scope review, the Northern IL AA. When comparing AAs in the state, the Northern IL AA represents 14 percent of the Illinois' branching network and 12 percent of its total deposit base. Performance in this area was given more emphasis than performance in limited-scope AAs.

Limited-scope reviews were performed for Bloomington MSA, Carbondale-Marion MSA, Central Non-MSA, Champaign-Urbana MSA, Coles County, Crawford County, Danville MSA, Davenport-Moline-Rock Island MSA, Decatur MSA, Kankakee MSA, Peoria MSA, Rockford MSA, St. Louis MSA, Southern Non-MSA, and the Springfield MSA.

Refer to the tables in Appendix D for more information on lending activity for the State of Illinois.

## **LENDING TEST**

The bank's performance under the Lending Test in the state of Illinois is rated Low Satisfactory. Based on a full-scope review, the bank's performance in the Northern Non-MSA AA is adequate.

## **Conclusions for Areas Receiving Full-Scope Reviews**

### **Lending Activity**

The bank's overall volume of loans in the Northern Non-MSA AA is adequate. Lending levels are adequate considering the bank's size, capacity and presence in the market. The bank has five banking offices in this AA and a small deposit base.

Refer to Tables 1 Lending Volume in the state of Illinois section of Appendix D for the facts and data used to evaluate the bank's lending activity.

During this evaluation period, WNB made 26 home mortgage refinance loans and 182 consumer loans. The bank made no home purchase, home improvement, multifamily or small farm loans. The bank did make 10 small loans to businesses however the volume was insufficient to perform a meaningful analysis. However, we did look at the distribution of these loans to determine where these loans were made and to what size businesses.

More emphasis was placed on consumer loans rather than the home mortgage refinance loans as consumer loans represent 77.50 percent of all loans originated in this AA. WNB is not a predominant home mortgage lender in this AA. In 2013, WNB was ranked 102 out of 229 lenders in overall market share for total home mortgage refinance loans in the Northern Non-MSA AA. WNB had nominal total market share of 0.10 percent.

With respect to deposit market share in this AA, as of June 30, 2014, WNB ranked last out of 69 institutions with a nominal market share of 0.05 percent.

### **Distribution of Loans by Income Level of the Geography**

Overall, WNB's geographic distribution of loans is adequate. The geographic distribution of refinance loans is poor. As previously stated, more emphasis was given to the bank's consumer lending. The geographic distribution of consumer loans is excellent.

#### ***Home Refinance Loans***

Refer to Tables 4 in the state of Illinois section of Appendix D for the facts and data used to evaluate the geographic distribution of the bank's home mortgage loan refinance originations.

The geographic distribution of refinance loans is poor. The bank made five loans in this AA. No loans were made in either low- or moderate-income tracts.

However, this loan volume is not sufficient to perform a meaningful analysis. The bank's poor lending performance in 2012/2013 had a negative impact on the overall conclusion for this area.

For 2014/2015, the bank's geographic distribution of refinance loans is also poor. This conclusion is based on small population of 21 loans and the significance of the conclusion is limited as a few more or less loans in any tract would change the bank's performance.

During this evaluation period, WNB made no loans in low-income geographies. However, the bank's poor performance is somewhat mitigated as the opportunities may be limited with only 0.44 percent of owner-occupied units in these tracts. The bank's distribution of loans in moderate-income geographies is near the percentage of owner-occupied units in these geographies. This reflects good performance. However, this assessment may be misleading as this conclusion is based on one loan made in the moderate-income tract for 2014/2015. The bank's market share for 2014 is also poor. The bank made no loans in either low- or moderate-income tracts during this time frame.

### ***Small Loans to Businesses***

Refer to Table 6 in the state of Illinois section of Appendix D for the facts and data used to evaluate the geographic distribution of the bank's small loans to businesses.

The bank made 10 small loans to businesses in this AA. Of this total, they made one loan in a moderate-income tract. However, the volume of loans made was insufficient to perform a meaningful analysis.

### ***Consumer Loans***

Refer to Tables 13 in the state of Illinois section of Appendix D for the facts and data used to evaluate the geographic distribution of the bank's consumer loan originations.

The geographic distribution of consumer loans is excellent.

For 2012/2013, the bank's geographic distribution of consumer loans is excellent. The distribution of loans in both low- and moderate-income geographies exceeds the percentage of households in these geographies. Market share data is not available for consumer loans.

For 2014/2015, the bank's geographic distribution of consumer loans is also excellent. Their distribution of loans in both low and moderate-income geographies exceeds the percentage of households in these geographies. Market share data is not available for consumer loans.

### ***Lending Gap Analysis***

We analyzed WNB's lending distribution within the Northern IL Non-MSA AA to determine if any unexplained, conspicuous gaps existed in the bank's home mortgage and consumer loan activity. We used lending distribution reports to identify geographies where the bank did not make any loans. We also reviewed the demographics of geographies where no loans were made. We considered loan distributions, branch locations, and demographic information.

As a result of this analysis, no unexplained conspicuous gaps were found in either the home residential mortgage or consumer loan lending activity.

### ***Inside/Outside Ratio***

A substantial majority of the bank's loans in the state of Illinois were made inside the AAs. Overall, 92.8 percent of the bank's loans in the state of Illinois were made inside their AAs. By loan product, 99.8 percent of HMDA loans and 95.8 percent of consumer loans were made inside WNB's AAs. This assessment was based on lending within this state rather than the entire bank. The percentage of lending in this AA was a neutral factor in the overall analysis of the Lending Test.

### **Distribution of Loans by Income Level of the Borrower**

Overall, WNB's distribution of loans by income level of the borrower is adequate. The borrower distribution of home refinance loans is poor. As previously stated, more emphasis was given to the bank's consumer lending. The borrower distribution of consumer loans is excellent.

#### ***Home Refinance Loans***

Refer to Tables 10 in the state of Illinois section of Appendix D for the facts and data used to evaluate the borrower distribution of the bank's home mortgage refinance loan originations.

The borrower distribution of refinance loans is poor. Of the five refinance loans made in 2012/2013, two were made to moderate-income borrowers. However, the volume of loans is not sufficient to conduct a meaningful analysis.

For 2014/2015, the bank's borrower distribution of loans is adequate. The distribution of loans to low-income families is somewhat lower than the percentage of low-income families in the AA. The distribution of loans in moderate-income families is near the percentage of moderate-income families. The bank's market share performance is also adequate. In 2014, WNB made no loans to low-income borrowers however their market share to moderate-income borrowers exceeds their overall market share. This reflects adequate performance.

#### ***Small Loans to Businesses***

Refer to Table 11 in the state of Illinois section of Appendix D for the facts and data used to evaluate the borrower distribution of the bank's loans to small businesses.

Of the 10 small loans to businesses made during this evaluation period, all loans were to small businesses. This demonstrates that the bank has a willingness to meet the needs of the small businesses in the AA.

#### ***Consumer Loans***

Refer to Tables 13 in the state of Illinois section of Appendix D for the facts and data used to evaluate the borrower income distribution of the bank's consumer loan originations.

The borrower distribution of consumer loans is excellent.

For 2012/2013, the bank's borrower distribution of consumer loans is excellent. The distribution of loans to both low- and moderate-income households exceeds the percentage of low- and moderate-income households in the AA. Market share data is not available for consumer loans.

For 2014/2015, the bank's borrower distribution of consumer loans is also excellent. The distribution of loans to both low- and moderate-income households exceeds the percentage of low- and moderate-income households. Market share data is not available for consumer loans.

### **Community Development Lending**

Refer to Tables 1 Lending Volume in the state of Illinois section of Appendix D for the facts and data used to evaluate the bank's level of community development lending. The totals on these tables include all CD loans, including multifamily loans that qualified for CD purposes during the evaluation period.

The level of CD lending in the Northern non-MSA AA is good and had a positive impact on the lending performance. During this evaluation period, the bank originated one CD loan in the AA totaling \$100,000 or 18 percent of allocated Tier One Capital. The loan provided financing in a full service community development finance institution. The institution invests in affordable housing developments and manages New Market Tax Credits in economic developments. This level of lending demonstrates good responsiveness to meeting the affordable housing needs in the AA.

### **Product Innovation and Flexibility**

WNB has established a lending partnership with a nationwide mortgage lender in manner that ensures that a full array of mortgage financing products are available to serve the full market of qualified borrowers in the communities where the bank conducts business. These programs had a neutral impact on the bank's lending performance.

### **Conclusions for Areas Receiving Limited-Scope Reviews**

Based on limited-scope reviews, the bank's overall performance in the Bloomington MSA, Carbondale MSA, Central Non-MSA, Davenport MSA, Decatur MSA and Peoria MSA AAs is not inconsistent with the bank's performance in the full-scope AA.

The bank's performance in the Champaign MSA, Coles County, Crawford County, Danville MSA, Kankakee MSA, Rockford MSA, Southern Non-MSA, Springfield, MSA, and St. Louis MSA AAs is poor and weaker than the bank's Low Satisfactory performance in the full-scope AA.

The weaker performance in these AAs can be attributed to the bank's minimal lending activity or poor distribution of loans. Performance in these limited-scope AAs was not significant enough to impact the overall Lending Test rating for the state.

Refer to Tables 1 through 13 in the state of Illinois section of Appendix D for the facts and data that support these conclusions.

## **INVESTMENT TEST**

The bank's performance under the Investment Test for Illinois is rated Low Satisfactory. Based upon a full-scope review, the bank's performance in the Northern Non-MSA AA is adequate.

### **Conclusions for Areas Receiving Full-Scope Reviews**

Refer to Table 14 in Appendix D for the facts and data used to evaluate the bank's level of qualified investments. Investment totals for the entire evaluation period including 2012/2013 and 2014/2015 are reflected in the 2014/2015 tables.

The level of CD investments is adequate. During the evaluation period, WNB made one investment in the Northern Non-MSA AA totaling \$79,000. This investment amount represents 14 percent of allocated Tier One Capital for the full-scope AA. WNB's qualified investment was comprised of a MBS secured by mortgages of low- and moderate-income borrowers in the AA. This investment was not flexible or innovative but did meet some of the affordable housing needs in the AA.

### **Conclusions for Areas Receiving Limited-Scope Reviews**

Based on limited-scope reviews, the bank's performance under the Investment Test in the Bloomington AA, Carbondale-Marion AA, Champaign-Urbana AA, Coles County AA, Davenport-Moline-Rock Island AA, Decatur AA, Kankakee AA, Peoria AA, Southern Non-MSA AA, Springfield AA, and St. Louis AA is not inconsistent with the bank's performance in the full-scope AA.

Based on limited-scope reviews, the bank's performance under the Investment Test in the Central Non-MSA AA, Crawford County AA, Danville AA, and Rockford AA is weaker than the bank's performance in the full-scope AA primarily due to a lower dollar volume and quality of investments. Performance in the limited-scope AA did not impact the bank's overall Investment Test rating as they represent 20.56 percent of the bank's deposits in the state.

Refer to Table 14 in Appendix D for the facts and data used to evaluate the bank's level of qualified investments.

## **SERVICE TEST**

The bank's performance under the Service Test in Illinois is rated Needs to Improve. Based on a full-scope review, the bank's performance in the Northern Non-MSA AA is adequate. However, weaker performance in the limited-scope AAs was significant enough to decrease the overall state rating.



## **Conclusions for Areas Receiving Full-Scope Reviews**

### **Retail Banking Services**

Refer to Table 15 in the Illinois AA section of Appendix D for the facts and data used to evaluate the distribution of the bank's branch delivery system and branch openings and closings.

The bank's delivery systems are reasonably accessible to geographies and individuals of different income levels in the AA.

WNB operates five banking offices in the Northern Non-MSA AA, all of which are located in Wal-Mart stores. Of these, none are located in low- or moderate- income CTs and therefore the bank's branch distribution in these tracts is significantly lower than the percentage of the population in these areas. However, 0.55 percent of the population resides in low-income tracts and 6.51 percent of the population in moderate-income tracts. The majority of the population, approximately 92.95 percent, resides in middle- and upper-income CTs.

Within this AA, the bank does have three offices that are located reasonably close to low- and moderate-income tracts. One branch is located within five miles of the low-income tract and another two offices are located near all seven moderate-income tracts.

No branches were opened or closed in this AA during this evaluation period. Therefore, WNB's record of opening and closing offices has not adversely affected low- or moderate-income individuals or geographies.

### **Community Development Services**

In the Northern Non-MSA, WNB's record of providing CD services is adequate based on the available opportunities in the AA and the bank's responsiveness to meeting community needs. We identified a significant number of non-profit organizations that operate in this AA.

During this evaluation period, WNB primarily provided financial literacy training using the FDIC's Money Smart program and held classes totaling 170 hours for low- and moderate-income individuals in the area. In addition, four bank officers served on boards or committee member for six nonprofits, including a local housing authority, a local housing coalition, homeless shelter, food pantry, and an affordable housing organization. These organizations are responsive and address some of the affordable housing and community service needs of LMI individuals in the area.

## **Conclusions for Areas Receiving Limited-Scope Reviews**

Based on limited-scope reviews, the bank's performance under the Service Test in the Bloomington MSA, Central Non-MSA, Champaign-Urbana MSA, Coles County, Danville MSA, Decatur MSA, Peoria MSA, Rockford MSA, Southern MSA and St Louis MSA is weaker than the bank's performance in the full-scope AA. This weaker performance is primarily attributed to a weaker branch distribution. These AAs represent 60.74 percent of the state's total deposits.

The performance in the Carbondale-Marion MSA, Crawford County, Davenport-Moline-Rock Island MSA, Kankakee MSA, and Springfield MSA are stronger than the performance in the full-scope AA. The stronger performance is attributable to a stronger branch distribution in the low- and moderate-income tracts. The performance in these limited-scope AAs was not significant enough to impact the overall state rating, representing only 27.66 percent of the bank's deposits in the state.

During the evaluation period, there was one banking office closed in the limited-scope review area. The branch was located in a middle-income tract. This closure was due to unprofitable performance, low customer traffic and the expiration of the lease contract. The branch closures have not adversely affected the accessibility of delivery systems, particularly in low- or moderate-income geographies or to low- or moderate-income families in the area.

## State of Indiana

### **CRA Rating for Indiana: Satisfactory**

**The Lending Test is rated: Low Satisfactory**

**The Investment Test is rated: Outstanding**

**The Service Test is rated: Low Satisfactory**

The major factors that support this rating include:

- The overall level of lending is adequate. The geographic distribution of loans is good. The distribution of loans by income level is adequate.
- The level of CD loans is good.
- The level of CD investments is excellent.
- Retail banking services are accessible to geographies and individuals of different income levels in the AA. However, performance in the limited-scope AAs had a negative impact on the overall state rating. The level of CD services is adequate.

### **Description of Institution's Operations in Indiana**

WNB has 41 branches in the State of Indiana. The State of Indiana represents 5 percent of the bank's branching network and 0.93 percent of their deposit base. WNB has deposits of \$34 million in the state. WNB has a small presence in the state and is ranked number 151 out of 165 institutions with a deposit market share of 0.03 percent according to 2014 FDIC information.

WNB had 16 AAs in the state including the Adams County, Bloomington MSA, Clinton County, Columbus MSA, Elkhart-Goshen MSA, Evansville MSA, Fort Wayne MSA, Henry County, Indianapolis-Carmel-Anderson MSA, Lafayette-West Lafayette MSA, Michigan City-La Porte MSA, Muncie MSA, Northern Non-MSA, South Bend-Mishawaka MSA, Southern Non-MSA (Southern IN), and the Terre Haute MSA. However, Adams County was eliminated from the state AAs after the bank closed its branch in this area in October 2013.

Refer to the market profiles for the State of Indiana in Appendix C for detailed demographics and other performance context information for AAs that received full-scope reviews.

### **Scope of Evaluation in Indiana**

We selected one AA in the state to perform a full-scope review, the Southern IN AA. When comparing AAs in the state, the Southern IN AA represents 17 percent of WNB's branching network in the state and 17 percent of its total deposit base. Performance in this area was given more emphasis than performance in limited-scope AAs.

Limited-scope reviews were performed for Bloomington MSA, Clinton County, Columbus MSA, Elkhart-Goshen MSA, Evansville MSA, Fort Wayne MSA, Henry County, Indianapolis-Carmel-Anderson MSA, Lafayette-West Lafayette MSA, Michigan City-La Porte MSA, Muncie MSA, Northern Non-MSA, South Bend-Mishawaka MSA, and the Terre Haute MSA.

Refer to the tables in Appendix D for more information on lending activity for the State of Indiana.

## **LENDING TEST**

The bank's performance under the Lending Test in the state of Indiana is rated Low Satisfactory. Based on a full-scope review, the bank's performance in the Southern IN Non-MSA AA is adequate.

## **Conclusions for Areas Receiving Full-Scope Reviews**

### **Lending Activity**

The bank's overall volume of loans in the Southern IN Non-MSA AA is adequate. Lending levels are adequate considering the bank's size, capacity and presence in the market.

Refer to Tables 1 Lending Volume in the state of Indiana section of Appendix D for the facts and data used to evaluate the bank's lending activity. The bank has seven offices in this AA and a small deposit base of \$5 million.

During this evaluation period, WNB made 24 home mortgage refinance loans and 256 consumer loans. No home purchase, multifamily or small farm loans were made in this AA. The bank made one home improvement loan and eight small loans to businesses in this AA. While the volume of home improvement and small loans to businesses is not sufficient to perform a meaningful analysis, we did review the distribution of these loans.

We placed more emphasis on consumer loans rather than the home mortgage refinance loans as consumer loans represent 88.89 percent of all loans originated in this AA. WNB is not a predominant home mortgage lender in this AA. In 2013, WNB was ranked 65 out of 159 lenders in overall market share for total home mortgage refinance loans in the Southern IN Non-MSA AA. WNB had nominal total market share of 0.08 percent.

With respect to deposit market share in this AA, as of June 30, 2014, WNB ranked last out of 26 institutions with a nominal market share of 0.11 percent. When we compared the bank's refinance market share to their deposit market share, their activity level is adequate.

### **Distribution of Loans by Income Level of the Geography**

Overall, WNB's geographic distribution of loans is good. The geographic distribution of refinance loans is adequate while the distribution of consumer loans is good. More emphasis was given to consumer loans in determining the overall conclusion.

#### ***Home Improvement Loans***

The bank made one home improvement loan during this evaluation period. The loan was not made in a low- or moderate-income tract.

### ***Home Refinance Loans***

Refer to Tables 4 in the state of Indiana section of Appendix D for the facts and data used to evaluate the geographic distribution of the bank's home mortgage loan refinance originations.

The geographic distribution of refinance loans is adequate. While the bank's performance in 2014/2015 is excellent, poor performance in 2012/2013 had a negative impact on the overall conclusion for this product. This conclusion is based on a blend of the bank's performance during both analysis periods.

For 2012/2013, the bank made three refinance loans. None of the loans were made in either a low- or moderate-income tract.

For 2014/2015, the bank's geographic distribution of loans is excellent. There are no low-income geographies in this AA. However, their distribution of loans in moderate-income geographies exceeds the percentage of owner-occupied units in these geographies. In addition, the bank's market share in low-income tracts exceeds their overall market share of loans in all tracts.

### ***Small Loans to Businesses***

Refer to Table 6 in the state of Indiana section of Appendix D for the facts and data used to evaluate the geographic distribution of the bank's small loans to businesses.

The bank made eight small loans to businesses, of which 4 were made in moderate-income tracts.

### ***Consumer Loans***

Refer to Tables 13 in the state of Indiana section of Appendix D for the facts and data used to evaluate the geographic distribution of the bank's consumer loan originations.

The geographic distribution of consumer loans is good.

For 2012/2013, the bank's geographic distribution of consumer loans is good. There are no low-income tracts in this AA. The bank's distribution of loans in moderate-income tracts is near the percentage of moderate-income households, which reflects good performance. Market share data is not available for consumer loans.

For 2014/2015, the bank's geographic distribution of consumer loans is excellent. There are no low-income tracts in this AA. The bank's distribution of loans in moderate-income geographies significantly exceeds the percentage of moderate-income households in these tracts.

### ***Lending Gap Analysis***

We analyzed WNB's lending distribution within the Southern IN Non-MSA AA to determine if any unexplained, conspicuous gaps existed in the bank's home mortgage and consumer loan activity.

We used lending distribution reports to identify geographies where the bank did not make any loans. We also reviewed the demographics of geographies where no loans were made. We considered loan distributions, branch locations, and demographic information. As a result of this analysis, no unexplained conspicuous gaps were found in either the home mortgage or consumer loan lending activity.

### ***Inside/Outside Ratio***

A majority of the bank's loans in the state of Indiana were made inside their AAs. Overall, 88.9 percent of the bank's loans in the state of Indiana were made inside their AAs. By loan product, 99.8 percent of HMDA loans and 94.0 percent of consumer loans were made inside WNB's AAs. This assessment was based on lending within this state rather than the entire bank. The percentage of lending in this AA was a neutral factor in the overall analysis of the Lending Test.

### **Distribution of Loans by Income Level of the Borrower**

Overall, WNB's distribution of loans by income level of the borrower is adequate. The borrower distribution of home refinance loans is poor. As previously stated, more emphasis was given to the bank's consumer lending. The borrower distribution of consumer loans is excellent.

#### ***Home Improvement Loans***

The one loan made in this AA was not to a low- or moderate-income borrower.

#### ***Home Refinance Loans***

Refer to Tables 10 in the state of Indiana section of Appendix D for the facts and data used to evaluate the borrower distribution of the bank's home mortgage refinance loan originations.

The borrower distribution of refinance loans is poor. Insufficient lending in 2012/2013 had a negative impact on the overall conclusion in this area. The overall conclusion was a blend of the bank's performance during both analysis periods.

For 2012/2013, the bank made three refinance loans in 2012/2013. None of the loans were to a low- or moderate-income borrower. However, this volume of loans is not sufficient to perform a meaningful analysis.

For 2014/2015, the bank's borrower distribution of loans is adequate. The distribution of loans to low-income families is somewhat lower than the percentage of low-income families in the AA. However, their distribution of loans to moderate-income families exceeds the percentage of moderate-income families. The bank's 2014 market share performance is also adequate. The bank's market share to low-income borrowers is adequate and lower than their overall market share to all borrowers. Whereas, their market share to moderate-income borrowers is somewhat lower than their overall market share, which represents poor performance.

### ***Small Loans to Businesses***

Refer to Table 11 in the state of Indiana section of Appendix D for the facts and data used to evaluate the borrower distribution of the bank's loans to small businesses.

The bank made eight small loans to businesses in this AA. All eight loans were made to small businesses.

### ***Consumer Loans***

Refer to Tables 13 in the state of Indiana AA section of Appendix D for the facts and data used to evaluate the borrower income distribution of the bank's consumer loan originations.

The borrower distribution of consumer loans is excellent.

For 2012/2013, the bank's borrower distribution of consumer loans is excellent. The distribution of loans to both low- and moderate-income households exceeds the percentage of both low- and moderate-income households in the AA. Market share data is not available for consumer loans.

For 2014/2015, the bank's borrower distribution of consumer loans is also excellent. The distribution of loans to both low- and moderate-income households exceeds the percentage of these households in the AA. Market share data is not available for consumer loans.

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

Refer to Tables 1 Lending Volume in the state of Indiana section of Appendix D for the facts and data used to evaluate the bank's level of community development lending. The totals on this table include all CD loans, including multifamily loans that qualified for CD purposes during the evaluation period.

The level of CD lending in the Southern Non-MSA AA is good. During this evaluation period, the bank made one CD loan totaling \$100,000 in this AA. CD lending represents 14 percent of allocated Tier One Capital. The loan provided financing to a full-service CDFI. This CDFI invests in affordable housing developments and also manages New Market Tax Credit in economic developments.

This loan was not innovative or flexible but demonstrated good responsiveness to meeting some of the affordable housing needs in the AA. CD lending had a positive impact on lending performance in the Southern Non-MSA AA.

### ***Product Innovation and Flexibility***

WNB has established a lending partnership with a nationwide mortgage lender in manner that ensures that a full array of mortgage financing products are available to serve the full market of qualified borrowers in the communities where the bank conducts business. These programs had a neutral impact on the bank's lending performance.

## Conclusions for Areas Receiving Limited-Scope Reviews

Based on limited-scope reviews, the bank's overall performance in the Evansville and Indianapolis MSA AAs is not inconsistent with the bank's performance in the full-scope AA.

The bank's performance in the Bloomington MSA, Clinton County, Columbus MSA, Elkhart MSA, Fort Wayne MSA, Henry County, Lafayette MSA, Michigan City MSA, Northern IN Non-MSA, Muncie MSA, South Bend, MSA, and Terre Haute MSA AAs is weaker than the bank's performance in the full-scope AA. The weaker performance in these AAs is attributed to nominal lending or poor distribution of loans to low- or moderate-income areas or individuals. However, the performance in these areas was not significant enough to impact the overall Lending Test rating for the state as these areas represent 46.60 percent of the deposits in the state.

Refer to Tables 1 through 13 in the state of Indiana section of Appendix D for the facts and data that support these conclusions.

## INVESTMENT TEST

The bank's performance under the Investment Test for Indiana is rated Outstanding. Based upon a full-scope review, the bank's performance in the Southern Non-MSA AA is excellent.

## Conclusions for Areas Receiving Full-Scope Reviews

Refer to Table 14 in Appendix D for the facts and data used to evaluate the bank's level of qualified investments. Investment totals for the entire evaluation period.

The bank has some opportunity to make qualified CD investments in the Southern Non-MSA AA. Based on the opportunities in the AA and the dollar amount of investments made, the bank's investment level is excellent. During the evaluation period, WNB purchased seven MBS investments in the Southern Non-MSA AA totaling \$632,000. This represents 86 percent of allocated Tier One Capital for the full-scope AA. These MBSs were primarily secured by mortgages to low- to moderate-income borrowers in the AA.

These investments were not innovative or flexible but demonstrated good responsiveness to addressing the affordable housing needs in the AA. Affordable housing is an identified need in all AAs reviewed.

## Conclusions for Areas Receiving Limited-Scope Reviews

Based on limited-scope reviews, the bank's performance under the Investment Test in the Evansville AA, Fort Wayne AA, Indianapolis-Carmel-Anderson AA, Northern Non-MSA AA and South Bend-Mishawaka AA is not inconsistent with the bank's performance in the full-scope AA.

Performance in the Bloomington AA, Clinton County AA, Columbus AA, Elkhart-Goshen AA, Henry County AA, Lafayette-West Lafayette AA, Michigan City-La Porte AA, Muncie AA and Terre Haute AA is weaker than the bank's performance in the full-scope AA.



The volume and quality of investments made in these AAs was significantly less than the investments made in the full-scope area. However, performance in these AAs did not have a significant impact on the bank's overall Investment Test rating as these areas represent 29.43 percent of the bank's deposits in the state.

Refer to Table 14 in Appendix D for the facts and data used to evaluate the bank's level of qualified investments.

## **SERVICE TEST**

The bank's performance under the Service Test in Indiana is rated Low Satisfactory. Based on a full-scope review, the bank's performance in the Southern Non-MSA AA is good. However, weaker performance in the limited-scope AAs had a negative impact on the bank's overall performance in the state and the Service Test rating.

## **Conclusions for Areas Receiving Full-Scope Reviews**

### **Retail Banking Services**

Refer to Table 15 in the Indiana AA section of Appendix D for the facts and data used to evaluate the distribution of the bank's branch delivery system and branch openings and closings.

The bank's delivery systems are accessible to geographies and individuals of different income levels in the AA.

WNB operates seven banking offices in the Southern Non-MSA AA, all of which are located in Wal-Mart stores. There are no low-income tracts in the AA. With 42.80 percent (3) of the locations in moderate-income CTs, the bank's percentage of branches significantly exceeds the percentage of the population in the area. About 12.72 percent of the population resides in moderate-income tracts. The majority of the population, approximately 87.28 percent, resides in middle- and upper-income CTs.

There were no branches opened or closed in this AA during this evaluation period. Therefore, the bank's opening and closing have not adversely affected low- and moderate-income individuals or geographies.

### **Community Development Services**

In the Southern Non-MSA, WNB's record of providing CD services is adequate based on the bank's responsiveness to identified needs. During this evaluation period, WNB primarily provided financial literacy training using the FDIC's Money Smart program and held classes totaling 151 hours for low- and moderate-income individuals in the area. In addition, one employee serves on the board for a non-profit affordable housing organization.

## **Conclusions for Areas Receiving Limited-Scope Reviews**

Based on limited-scope reviews, the bank's performance under the Service Test in the Columbus MSA, Michigan City-La Porte MSA, and Northern Non-MSA is not inconsistent with the bank's performance in the full-scope AA. These AAs represent 16.89 percent of the state's total deposits.

The bank's performance in the Evansville MSA, Fort Wayne MSA, Indianapolis-Carmel-Anderson MSA, Muncie MSA and South Bend-Mishawaka MSA is adequate but weaker than their performance in the full-scope AA. Their performance in the Bloomington MSA, Clinton County, Elkhart-Goshen MSA, Henry County, Lafayette-West Lafayette MSA, and Terre Haute MSA is poor and overall weaker than the bank's performance in the full-scope AA performance. The poor performance is attributable to a weaker branch distribution in the low- and moderate-income tracts. In assessing the bank's performance in limited-scope AAs, we also reviewed the distribution of the bank's delivery systems throughout the state. Of the 41 branches in the state, none are located in low-income tracts. Performance in these AAs was significant enough to negatively impact the bank's overall performance in the state.

## State of Kentucky

**CRA Rating for Kentucky: Satisfactory**  
**The Lending Test is rated: Low Satisfactory**  
**The Investment Test is rated: High Satisfactory**  
**The Service Test is rated: High Satisfactory**

The major factors that support this rating include:

- The overall level of lending is adequate. Geographic distribution of loans is good. Distribution of loans by income level is good.
- The level of CD loans is adequate.
- The level of CD investments is good.
- The bank's delivery systems are reasonably accessible to geographies and individuals of different income levels in the AA. The level of CD services is excellent and increased the Service Test rating for the state.

### Description of Institution's Operations in Kentucky

WNB has 19 branches in the State of Kentucky. The State of Kentucky represents 2.54 percent of the bank's branching network and 0.44 percent of their deposit base. The bank has deposits of \$16 million in the state. WNB has a small presence in the state and is ranked number 202 out of 208 institutions with a deposit market share of 0.02 percent.

WNB has ten AAs in the state including the Adair County, Bowling Green MSA, Central Non-MSA, Elizabethtown-Fort Knox MSA, Harrison County, Lexington-Fayette MSA (Lexington AA), Owensboro MSA, Rowan County, Southwest Non-MSA, and the Western Non-MSA. However, the state's AA changed as the Harrison County AA was eliminated in 2014 after a branch closure.

Refer to the market profiles for the State of Kentucky in Appendix C for detailed demographics and other performance context information for AAs that received full-scope reviews.

### Scope of Evaluation in Kentucky

We selected one AA in the state to perform a full-scope review, the Lexington AA. When comparing this AA to the bank's presence in the state, the Lexington AA represents 21 percent of the bank's branching network and 18 percent of its total deposit base. Performance in this area was given more emphasis than performance in limited-scope AAs.

Limited-scope reviews were performed for Adair County, Bowling Green MSA, Central Non-MSA, Elizabethtown-Fort Knox MSA, Owensboro MSA, Rowan County, Southwest Non-MSA, and the Western Non-MSA.

Refer to the tables in Appendix D for more information on lending activity for the State of Kentucky.

## **LENDING TEST**

The bank's performance under the Lending Test in the state of Kentucky is rated Low Satisfactory. Based on a full-scope review, the bank's performance in the Lexington AA is adequate.

### **Conclusions for Areas Receiving Full-Scope Reviews**

#### **Lending Activity**

The bank's overall volume of loans in the Lexington AA is adequate. Lending levels are adequate considering the bank's size, capacity and presence in the market. The bank has four branches in this AA and a small deposit base of \$2 million.

Refer to Tables 1 Lending Volume in the state of Kentucky section of Appendix D for the facts and data used to evaluate the bank's lending activity.

During this evaluation period, WNB made 55 home mortgage refinance loans, 22 loans to small businesses, and 100 consumer loans. The bank made no small farm, multifamily, home purchase loans during this evaluation period. The bank did make one home improvement loan in a moderate-income tract.

More emphasis was placed on consumer loans than refinance or small loans to businesses as consumer loans represent 56.50 percent of all loans originated in this AA. The bank's home mortgage refinance loans were given more emphasis than the small loans to businesses. WNB is not a predominant home mortgage lender in this AA. In 2013, WNB was ranked 55 out of 230 lenders in overall market share for total home mortgage refinance loans in the Lexington AA. WNB had nominal total market share of 0.26 percent. WNB made no small loans to businesses in the AA in 2013; therefore their market share was zero.

With respect to deposit market share in this AA, as of June 30, 2014, WNB ranked 31 out of 32 institutions with a nominal market share of 0.03 percent.

#### **Distribution of Loans by Income Level of the Geography**

Overall, WNB's geographic distribution of loans is good. The geographic distribution of both refinance loans and small loans to businesses is adequate. As previously stated, more emphasis was given to the bank's consumer lending. The geographic distribution of consumer loans is excellent.

#### ***Home Refinance Loans***

Refer to Tables 4 in the state of Kentucky section of Appendix D for the facts and data used to evaluate the geographic distribution of the bank's home mortgage loan refinance originations.

The geographic distribution of home refinance loans is adequate. However, this assessment is based on a small population of loans, 25 in 2012/2013 and 30 in 2014/2015. Therefore, there was not a significant difference in the number of loans in the CT categories.

For 2012/2013, the bank's geographic distribution of loans is poor. Their distribution of loans in low-income tracts is near the percentage of owner-occupied units in these geographies. This reflects good performance. However, the bank's performance in moderate-income tracts is very poor. Their distribution of loans is significantly lower than the percentage of owner-occupied units in these geographies. Based on 2013 market share information, WNB's market share in low-income tracts exceeds their overall market share in all tracts. However, their market share in moderate-income tracts is significantly lower than their overall market share.

For 2014/2015, the bank's geographic distribution of loans is excellent. The distribution of loans in both low- and moderate-income geographies exceeds the percentage of owner-occupied units in these geographies. The bank's 2014 market share performance is good. Their market share in low-income tracts is lower than their overall market share of loans in all tracts. This represents adequate performance. However, in moderate-income tracts, their market share is excellent as it significantly exceeds their overall market share.

### ***Small Loans to Businesses***

Refer to Tables 6 in the state of Kentucky section of Appendix D for the facts and data used to evaluate the geographic distribution of the bank's small loans to businesses.

The geographic distribution of small loans to businesses is adequate. While the bank's performance in 2014/2015 is adequate, their poor performance in 2012/2013 had a negative impact on the conclusion for this area. Furthermore, the population of loans reviewed in 2014/2015 was 22 therefore there was not a significant difference in the number of loans the bank made in the various tract categories.

For 2012/2013, WNB made no small loans to businesses in this AA during this time frame.

For 2014/2015, the bank's geographic distribution of loans is good. The distribution of small loans to businesses in low-income tracts exceeds the percentage of businesses in these geographies. However, their distribution of small loans to businesses in moderate-income tracts is somewhat below the percentage of businesses in these geographies. This represents poor performance. However, their 2014 market share performance is good. In low-income tracts, their market share significantly exceeds their overall market whereas in moderate-income tracts, their performance is near their overall market share.

### ***Consumer Loans***

Refer to Tables 13 in the state of Kentucky section of Appendix D for the facts and data used to evaluate the geographic distribution of the bank's consumer loan originations.

The geographic distribution of consumer loans is excellent.

For 2012/2013, the bank's geographic distribution of consumer loans is excellent. The distribution of loans in both low- and moderate-income tracts exceeds the percentage of households in these geographies. Market share data is not available for consumer loans.

For 2014/2015, the bank's geographic distribution of consumer loans is also excellent. The distribution of loans in both low- and moderate-income tracts exceeds the percentage of households in these geographies. Market share data is not available for consumer loans.

### ***Lending Gap Analysis***

We analyzed WNB's lending distribution within the Lexington MSA AA to determine if any unexplained, conspicuous gaps existed in the bank's home mortgage, small business, and consumer loan activity. We used lending distribution reports to identify geographies where the bank did not make any loans. We also reviewed the demographics of geographies where no loans were made.

We considered loan distributions, branch locations, and demographic information. As a result of this analysis, no unexplained conspicuous gaps were found in the home mortgage, small business, or consumer loan lending activity.

### ***Inside/Outside Ratio***

A majority of the bank's loans in the state of Kentucky were made inside their AAs. Overall, 87.9 percent of the bank's loans in the state of Kentucky were made inside their AAs. By loan product, 99.6 percent of HMDA loans, 90.2 percent of small loans to business, and 85.4 percent of consumer loans were made inside WNB's AAs. This assessment was based on lending within this state rather than the entire bank. The percentage of lending in this AA was a neutral factor in the overall analysis of the Lending Test.

## **Distribution of Loans by Income Level of the Borrower**

Overall, WNB's distribution of loans by income level of the borrower is good. The borrower distribution of home refinance loans is good. The borrower distribution of small loans to businesses is adequate. As previously stated, more emphasis was given to the bank's consumer lending. The borrower distribution of consumer loans is excellent.

### ***Home Refinance Loans***

Refer to Tables 10 in the state of Kentucky section of Appendix D for the facts and data used to evaluate the borrower distribution of the bank's home mortgage refinance loan originations.

The borrower distribution of refinance loans is good. This assessment is based on a small population of loans, 25 in 2012/2013 and 30 in 2014/2015; as a result there was not a significant difference in the number of loans the bank made to borrowers in each income category.

For 2012/2013, the bank's borrower distribution of loans is adequate. The distribution of loans to both low- and moderate-income borrowers is lower than the percentage of low- and moderate-income families in the AA. This reflects adequate performance. However, the bank's 2013 market share to low-income borrowers exceeds their market share of loans to all borrowers. Their market share to moderate-income borrowers is lower than their overall market share to all borrowers.

For 2014/2015, the bank's borrower distribution of loans is excellent. The distribution of loans to both low- and moderate-income families exceeds the percentage of these families in the AA. In addition, the bank's 2014 market share performance is also excellent. The bank's market share to both low- and moderate-income borrowers significantly exceeds their overall market share of refinance loans to all borrowers.

### ***Small Loans to Businesses***

Refer to Tables 11 in the state of Kentucky AA section of Appendix D for the facts and data used to evaluate the borrower distribution of the bank's small loans to businesses.

The distribution of loans by revenue of the business is adequate. This conclusion is a blend of the bank's performance during both analysis periods. Poor performance during the 2012/2013 analysis period had a negative impact on the overall conclusion for this area. Furthermore, conclusions for 2014/2015 time period are based on a small sample of 22 loans.

For 2012/2013, the bank made no small loans to businesses during this time frame.

For 2014/2015, the bank's borrower distribution of loans is excellent. WNB's dispersion of small loans to businesses exceeds the percent of small businesses in the AA. Furthermore, the bank's 2014 market share shows that WNB's market share to small businesses significantly exceeds their overall market share of loans to all businesses. This further demonstrates that the bank is meeting the lending needs of small businesses.

### ***Consumer Loans***

Refer to Tables 13 in the state of Kentucky AA section of Appendix D for the facts and data used to evaluate the borrower income distribution of the bank's consumer loan originations.

The borrower distribution of consumer loans is excellent.

For 2012/2013, the bank's borrower distribution of consumer loans is excellent. The distribution of loans to both low- and moderate-income households exceeds the percentage of these households in the AA. Market share data is not available for consumer loans.

For 2014/2015, the bank's borrower distribution of consumer loans is also excellent. The distribution of loans to both low- and moderate-income households exceeds the percentage of both low- and moderate-income households in the AA. Market share data is not available for consumer loans.

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

Refer to Tables 1 Lending Volume in the state of Kentucky section of Appendix D for the facts and data used to evaluate the bank's level of community development lending. The totals in this table include all CD loans, including multifamily loans that qualified for CD purposes during the evaluation period.

The level of CD lending is adequate based on the lending level and the responsiveness to the community credit needs.

The bank originated one CD loan in the AA totaling \$45,000 or 12 percent of allocated Tier One Capital. The loans provided small business financing for startups and established businesses. This lending level demonstrates adequate responsiveness and help meet identified economic development needs in the AA as mentioned by multiple contacts. Community development lending had a neutral impact on lending performance in the Lexington AA.

### **Product Innovation and Flexibility**

WNB has established a lending partnership with a nationwide mortgage lender in manner that ensures that a full array of mortgage financing products are available to serve the full market of qualified borrowers in the communities where the bank conducts business. These programs had a neutral impact on the bank's lending performance.

### **Conclusions for Areas Receiving Limited-Scope Reviews**

Based on limited-scope reviews, the bank's overall performance in the Adair County, Bowling Green MSA, Central Non-MSA, Elizabethtown MSA, Owensboro MSA, Rowan County, Southwest Non-MSA, and Western Non-MSA AAs is not inconsistent with the bank's performance in the full-scope AA.

The bank performance in the Harrison County AA is very poor and significantly below the bank's overall performance in the full-scope AA. The weaker performance in the AA can be attributed to nominal lending activity as the bank's only branch in this AA was closed during the evaluation period. However, the performance in this area is not significant enough to impact the overall Lending Test rating for the state.

Refer to Tables 1 through 13 in the state of Kentucky section of Appendix D for the facts and data that support these conclusions.

### **INVESTMENT TEST**

The bank's performance under the Investment Test for Kentucky is rated High Satisfactory. Based upon a full-scope review, the bank's performance in the Lexington AA is good.

### **Conclusions for Areas Receiving Full-Scope Reviews**

Refer to Table 14 in Appendix D for the facts and data used to evaluate the bank's level of qualified investments.

WNB's investment levels is good. Based on the ample opportunities in the AA to make qualified investments and the bank's responsiveness to meeting the needs of the community, the bank's level of investments is good.

During this evaluation period, WNB made nine investments in the Lexington AA totaling \$786,000. This represents 202 percent of allocated Tier One Capital for the full-scope AA.



Two investments totaling \$12,000 provided grants and donations to local organizations that provided community development services to low- to moderate-income individuals. The remaining \$775,000 was comprised of MBS secured by mortgages to low- and moderate-income borrowers throughout the AA. The investments were not considered innovative or flexible in nature but showed good responsiveness to meeting the affordable housing and service needs of the AA.

## **Conclusions for Areas Receiving Limited-Scope Reviews**

Based on limited-scope reviews, the bank's performance under the Investment Test in the Adair County AA, Bowling Green AA, Central Non-MSA AA, Elizabethtown-Fort Knox AA, Harrison County AA, Owensboro AA, Rowan County AA, and Southwest Non-MSA AA is adequate but weaker than the bank's performance in the full-scope AA. The amount and quality of WNB's investment amounts in these AAs were significantly lower. Performance in the limited-scope AA did not impact the bank's overall Investment Test rating. The bank made no investments in the Western Non-MSA AA during this evaluation period.

Refer to Table 14 in Appendix D for the facts and data used to evaluate the bank's level of qualified investments.

## **SERVICE TEST**

The bank's performance under the Service Test in Kentucky is rated High Satisfactory. Based on a full-scope review, the bank's performance in the Lexington AA is adequate. However, the level and quality of CD services is excellent and elevated the overall rating for the state.

## **Conclusions for Areas Receiving Full-Scope Reviews**

### **Retail Banking Services**

Refer to Table 15 in the Kentucky AA section of Appendix D for the facts and data used to evaluate the distribution of the bank's branch delivery system and branch openings and closings.

The bank's delivery systems are reasonably accessible to geographies and individuals of different income levels in the AA.

WNB operates four banking offices in the Lexington AA, all of which are located in Wal-Mart stores. Of these, none are located in low-income CTs and therefore the bank's branch distribution in these tracts is significantly lower than the percentage of the population in the area, which is 10.72 percent. With 25.00 percent (1) of the locations in moderate-income CTs, the bank's percentage of branches is near to the percentage of the population in the area, which is 26.07 percent. The majority of the population, approximately 63.20 percent, resides in middle- and upper-income CTs.

However, access to the bank's delivery systems to low- and moderate-income tracts is increased with branches that are near these tracts.

The bank has two branches that are located within five miles of seven moderate-income tracts and one branch is located within five miles of all low-income tracts and nine moderate-income tracts.

During this evaluation period, no branches were opened or closed in the Lexington AA. Therefore, the bank's opening and closing practices did not adversely affect the accessibility of delivery systems, particularly in low- or moderate-income CTs.

## **Community Development Services**

In the Lexington MSA, WNB's record of providing CD services is excellent based on the significant number of service hours provided. We identified several nonprofits and one CDFI that operate in this area. During this evaluation period, WNB primarily provided financial literacy training using the FDIC's Money Smart program and held classes totaling 424 hours for low- and moderate-income individuals in the area.

In addition, four bank officers serve on a board, program or finance committee for three nonprofits that provide services to underprivileged children and promote affordable housing.

Specific examples follow:

- Serve on the board for a non-profit organization that connects prison offenders with job opportunities.
- Serve as a program committee member for an organization that provides financial education classes to K-12 students that are economically disadvantaged. The majority of the students attending these schools receive free or reduced lunches.

## **Conclusions for Areas Receiving Limited-Scope Reviews**

Based on limited-scope reviews, the bank's performance under the Service Test in the Central Non-MSA and Southwest Non-MSA is consistent with the bank's performance in the full-scope AA. Their performance in the Adair County, Bowling Green MSA, Elizabethtown-Fort Knox MSA, Harrison County, Owensboro MSA, Rowan County, and Western Non-MSA is weaker than the bank's overall performance in the state. The performance is attributable to a weaker branch distribution in the low- and moderate-income tracts. These AAs represent 40.93 percent of the bank's deposits in the state and the bank's distribution in these AAs was not significant enough to have a negative impact on the overall Service Test rating for the state.

During the evaluation period, there were three banking offices closed in the limited-scope review areas. Of these, one was located in a middle- income tract and two were located in upper- income tracts. These closures were due to unprofitable performance and low customer traffic. The branch closures have not adversely affected the accessibility of delivery systems, particularly in low- or moderate-income geographies or to low- or moderate-income families in the area. These closures resulted in the elimination of the Harrison County MSA AA and Caldwell County, which is located in the Western Non-MSA AAs.

## State of Louisiana

**CRA Rating for Louisiana: Needs to Improve**  
**The Lending Test is rated: Needs to Improve**  
**The Investment Test is rated: High Satisfactory**  
**The Service Test is rated: Low Satisfactory**

The major factors that support this rating include:

- The overall level of lending is poor in the full-scope AA. Lending volume in the limited-scope AAs is also poor.
- The level of CD loans is adequate and had a neutral impact on the Lending Test rating.
- The level of CD investments is good.
- Retail delivery systems are unreasonably inaccessible to portions of the AA, particularly low- and moderate-income geographies and individuals. Excellent level of CD services and stronger branch distribution in limited-scope AAs helped to increase the Service Test rating.

### Description of Institution's Operations in Louisiana

WNB has 19 branches in the State of Louisiana. The State of Louisiana represents 2.54 percent of the bank's branching network and 0.34 percent of their deposit base. The bank has deposits of \$12.7 million in the state. WNB has a small presence in the state and is ranked number 148 out of 152 institutions with a deposit market share of 0.01 percent.

WNB has 12 AAs in the state including the Alexandria MSA, Baton Rouge MSA, Hammond MSA, Houma-Thibodaux MSA, Lafayette MSA, Lake Charles MSA, Lincoln Parish, Monroe MSA, Morehouse Parish, New Orleans-Metairie MSA, Shreveport-Bossier City MSA, and the Southern Non-MSA (Southern LA).

Refer to the market profiles for the State of Louisiana in Appendix C for detailed demographics and other performance context information for AAs that received full-scope reviews.

### Scope of Evaluation in Louisiana

We selected one AA in the state to perform a full-scope review, the Southern LA AA. When comparing this AA to the bank's presence in the state, the Southern LA AA represents 11 percent of the bank's branching network and 12 percent of its total deposit base. Performance in this area was given more emphasis than performance in limited-scope AAs.

Limited-scope reviews were performed for Alexandria MSA, Baton Rouge MSA, Hammond MSA, Houma-Thibodaux MSA, Lafayette MSA, Lake Charles MSA, Lincoln Parish, Monroe MSA, Morehouse Parish, New Orleans-Metairie MSA, and the Shreveport-Bossier City MSA.

Refer to the tables in Appendix D for more information on lending activity for the State of Louisiana.

## **LENDING TEST**

The bank's performance under the Lending Test in the state of Louisiana is rated Needs to Improve. Based on a full-scope review, the bank's performance in the Southern LA AA is poor.

### **Conclusions for Areas Receiving Full-Scope Reviews**

#### **Lending Activity**

The bank's overall volume of loans in the Southern LA Non-MSA AA is poor. Lending levels are poor considering the bank's size, capacity and presence in the market. The number of loans made over the evaluation period is considered nominal given that the bank has two banking offices in this AA.

Refer to Tables 1 Lending Volume in the state of Louisiana section of Appendix D for the facts and data used to evaluate the bank's lending activity.

During this evaluation period, WNB made 89 consumer loans and 21 refinance loans. The overall volume of consumer and refinance loans made during this evaluation period was not sufficient enough to compensate for the bank's poor lending levels in the other products. The bank made no small farm, home purchase, home improvement, or multifamily loans during this evaluation period. The bank did make one small loan to business. This loan was made to a small business.

Consumer loans represent 80.18 percent of all loans originated in this AA. WNB is not a predominant home mortgage lender in this AA. In 2013, WNB was ranked 54 out of 130 lenders in overall market share for total home mortgage refinance loans in the Southern LA Non-MSA AA. WNB had nominal total market share of 0.26 percent.

With respect to deposit market share in this AA, as of June 30, 2014, WNB ranked last out of 23 institutions with a nominal market share of 0.06 percent.

#### **Distribution of Loans by Income Level of the Geography**

The geographic distribution of refinance and consumer loans is poor.

##### ***Home Refinance Loans***

Refer to Table 4 in the state of Louisiana section of Appendix D for the facts and data used to evaluate the geographic distribution of the bank's home mortgage loan refinance originations.

The bank made 4 refinance loans in 2012/2013 and 17 in 2014/2015. While the volume of loans in each evaluation period was not sufficient to perform a meaningful analysis, we reviewed the distribution of these loans in total. Of these 21 loans, no loans were made in low-income tract and 5 (24 percent) were made in moderate-income tracts.

### ***Consumer Loans***

Refer to Table 13 in the state of Louisiana section of Appendix D for the facts and data used to evaluate the geographic distribution of the bank's consumer loan originations.

In terms of consumer loans, WNB made 89 consumer loans during the evaluation period. The bank's geographic distribution of loans is poor. For 2012/2013, the bank made 18 loans. While the volume of loans was insufficient to perform a meaningful analysis, we did review the distribution of these loans. The bank made no loans in low-income tracts and 5 loans were made in moderate-income tracts.

For 2014/2015, the distribution of loans was adequate. In low-income tracts, the distribution of loans is significantly below the percentage of owner-occupied units in these tracts. This reflects very poor performance. In moderate-income CTs, the distribution of loans exceeds the percentage of moderate-income tracts. Market share data is not available for consumer loans.

### ***Lending Gap Analysis***

A lending gap analysis was not performed for this AA, as the lending volume in the Southern LA Non-MSA AA was insufficient to perform a meaningful analysis.

### ***Inside/Outside Ratio***

A substantial majority of the bank's loans in the state of Louisiana were made inside their AAs. Overall, 94.5 percent of the bank's loans in the state of Louisiana were made inside their AAs. By loan product, 100 percent of HMDA loans and 91.9 percent of consumer loans were made inside WNB's AAs. This assessment was based on lending within this state rather than the entire bank. The percentage of lending in this AA was a neutral factor in the overall analysis of the Lending Test.

## **Distribution of Loans by Income Level of the Borrower**

### ***Home Refinance Loans***

Refer to Table 10 in the state of Louisiana section of Appendix D for the facts and data used to evaluate the borrower distribution of the bank's home mortgage refinance loan originations.

During this evaluation period, the bank made 21 refinance loans. Four loans were made in 2012/2013 and 17 were made in 2014/2015. Of the total number, no loans were made to low-income borrowers and two (9.52 percent) were made to moderate-income borrowers.

### ***Consumer Loans***

Refer to Table 13 in the state of Louisiana section of Appendix D for the facts and data used to evaluate the borrower income distribution of the bank's consumer loan originations.

Of the 18 loans made in 2012/2013, six were made to low-income and seven to moderate-income borrowers.

For 2014/2015, the dispersion of consumer loans is excellent. The distribution of loans to both low- and moderate-income households exceeds the percentage of low-income households.

## **Community Development Lending**

Refer to Tables 1 Lending Volume in the state of Louisiana section of Appendix D for the facts and data used to evaluate the bank's level of community development lending. The totals on this table include all CD loans, including multifamily loans that qualified for CD purposes during the evaluation period.

The level of CD lending is adequate. During this evaluation period, WNB made one qualified CD loan totaling \$20,000 or 10 percent of allocated Tier One Capital in this AA. The loan provided financing for small business loans for startup and established businesses. Community development lending had a neutral impact on lending performance in the Southern AA. Based on the ample opportunities in the AA and the bank's responsiveness to identified needs in the AA, this level of CD lending is adequate. Education, home improvement and refinance loans were mentioned as important needs in the Southern LA AA.

## **Product Innovation and Flexibility**

WNB has established a lending partnership with a nationwide mortgage lender in manner that ensures that a full array of mortgage financing products are available to serve the full market of qualified borrowers in the communities where the bank conducts business. These programs had a neutral impact on the bank's lending performance.

## **Conclusions for Areas Receiving Limited-Scope Reviews**

Based on limited-scope reviews, the bank's overall performance in the Alexandria MSA, Baton Rouge MSA, Houma MSA, Lafayette MSA, Lake Charles MSA, Lincoln Parish, Monroe MSA, New Orleans MSA, and Shreveport MSA AAs is not inconsistent with the bank's Needs to Improve in the full-scope AA.

Refer to Tables 1 through 13 in the state of Louisiana section of Appendix D for the facts and data that support these conclusions.

## **INVESTMENT TEST**

The bank's performance under the Investment Test for Louisiana is rated High Satisfactory. Based upon a full-scope review, the bank's performance in the Southern LA AA is good.

## **Conclusions for Areas Receiving Full-Scope Reviews**

Refer to Table 14 in Appendix D for the facts and data used to evaluate the bank's level of qualified investments. Investment totals for the entire evaluation period are reflected in this table.

The level of CD investments is good. The bank has ample opportunity to make qualified CD investments in the Southern AA. During the evaluation period, WNB made five investments totaling \$72,000, which represents 36 percent of allocated Tier One Capital in this AA.

WNB purchased three certificate of deposits totaling \$60,000 with a local minority-owned bank to help meet the credit needs in the AA. The bank also made two grants or donations for \$12,000 to an organization in the AA that provided affordable housing services to low- to moderate-income individuals. The investments were not considered innovative or flexible in nature but were responsive to the needs of the AA.

## **Conclusions for Areas Receiving Limited-Scope Reviews**

Based on limited-scope reviews, the bank's performance under the Investment Test in the New Orleans-Metairie AA, Baton Rouge AA, Shreveport-Bossier City AA, Lafayette AA, Hammond AA, Houma-Thibodaux AA, and Lake Charles AA is greater than the bank's performance in the full-scope AA. Performance in the Alexandria AA and Monroe AA is not inconsistent with the bank's performance in the full-scope AA.

Performance in the Lincoln Parish AA is weaker than the bank's performance in the full-scope AA as the dollar volume and quality of investments made in this AA was smaller. Performance in this limited-scope AA did not impact the bank's overall Investment Test rating as the AA represents only 3.70 percent of the bank's deposits in this state.

Refer to Table 14 in Appendix D for the facts and data used to evaluate the bank's level of qualified investments.

## **SERVICE TEST**

The bank's performance under the Service Test in Louisiana is rated Low Satisfactory. Based on a full-scope review, the bank's performance in the Southern Non-MSA AA is poor. However, an excellent level of CD services and stronger performance in the limited-scope AAs increased the Service Test rating.

## **Conclusions for Areas Receiving Full-Scope Reviews**

### **Retail Banking Services**

Refer to Table 15 in the Louisiana AA section of Appendix D for the facts and data used to evaluate the distribution of the bank's branch delivery system and branch openings and closings.

The bank's delivery systems are unreasonably inaccessible to portions of the AA, particularly low- and moderate-income geographies and individuals.

WNB operates two banking offices in the Southern LA AA, all of which are located in Wal-Mart stores. Of these, none are located in low- or moderate-income CTs.

Therefore, the percentage of branches in low- and moderate-income tracts is significantly lower than the percentage of the population that resides in these tracts with 5.93 percent of the population residing in low-income tracts and 21.92 percent of the population residing in moderate-income tracts.

When we analyzed the bank's branches that are near low or moderate-income tracts, access to the bank's delivery systems did not improve significantly. No offices were located near the low-income tracts and both offices were located within a five mile radius of two moderate-income tracts.

The bank's record of opening and closing branches has not adversely affected the accessibility of delivery systems, particularly in low- or moderate-income geographies or to low- or moderate-income families in the area. During this evaluation period, there were no banking offices opened or closed in the AA.

## **Community Development Services**

In the Southern Non MSA, WNB's record of providing CD services is excellent based on their responsiveness to meeting the needs in the AA. We identified a significant number of non-profit organizations and CDFIs that operate in this AA. During this evaluation period, WNB primarily provided financial literacy training using the FDIC's Money Smart program and held classes totaling 962 hours for low- and moderate-income individuals in the area. The bank had two employees serving on the board of a local medical center and food bank, which provided services to low- to moderate-income individuals.

Given the available resources and level of services provided, WNB's level of CD services demonstrate excellent responsiveness to meeting the identified needs in this AA.

## **Conclusions for Areas Receiving Limited-Scope Reviews**

Based on limited-scope reviews, the bank's performance under the Service Test in the Alexandria MSA, Houma-Thibodaux MSA, Lafayette MSA, Lincoln Parish MSA, Monroe MSA, Morehouse Parish MSA, and Shreveport-Bossier City MSA is weaker than the bank's overall performance in the full-scope AA. These AAs have one banking office and these offices are not located in a low- or moderate-income tracts. These AAs represent 31.93 percent of the bank's total deposits in the state.

However, performance in the Baton Rouge MSA, Hammond MSA, Lake Charles MSA, and New Orleans-Metairie MSA is stronger than the bank's overall performance in the full-scope AA. The stronger performance is attributable to a stronger branch distribution in the low- and moderate-income tracts. These AAs represent 55.61 percent of the bank's deposits in the state. The stronger performance in the limited-scope AAs had a positive impact on the overall state rating.



## State of Maryland

**CRA Rating for Maryland: Needs to Improve**  
**The Lending Test is rated: Needs to Improve**  
**The Investment Test is rated: High Satisfactory**  
**The Service Test is rated: Needs to Improve**

The major factors that support this rating include:

- The overall level of lending is poor.
- The volume of CD loans is adequate.
- The volume of CD investments is good.
- The bank's delivery systems are reasonably accessible to geographies and individuals of different income levels in the full-scope AA. However, poor distribution of the bank's banking offices in the limited-scope AAs had a negative impact on the state rating. The number of CD service provided is adequate.

### Description of Institution's Operations in Maryland

WNB has nine branches in the state of Maryland. The state of Maryland represents 1.20 percent of the bank's branching network and 0.24 percent of their deposit base. The bank has deposits of \$9 million in the state. WNB has a small presence in the state and is ranked number 106 out of 116 institutions with a deposit market share of 0.01 percent.

WNB has three AAs in the state including the Baltimore-Columbia-Townson MD, California-Lexington Park MD, and the Salisbury MSA (Salisbury AA).

Refer to the market profiles for the state of Maryland in Appendix C for detailed demographics and other performance context information for AAs that received full-scope reviews.

### Scope of Evaluation in Maryland

We selected one AA in the state to perform a full-scope review, the Salisbury AA. When comparing this AA to the bank's presence in the state, the Salisbury AA represents 33 percent of the bank's branching network and 36 percent of its total deposit base. Performance in this area was given more emphasis than performance in limited-scope AAs.

Limited-scope reviews were performed for Baltimore-Columbia-Townson MD, and the California-Lexington Park MD.

Refer to the tables in Appendix D for more information on lending activity for the State of Maryland.

## **LENDING TEST**

The bank's performance under the Lending Test in the state of Maryland is rated Needs to Improve. Based on a full-scope review, the bank's performance in the Salisbury AA is poor.

### **Conclusions for Areas Receiving Full-Scope Reviews**

#### **Lending Activity**

The bank's overall volume of loans in the Salisbury AA is poor. Lending levels are poor considering the bank's size, capacity and presence in the market.

Refer to Tables 1 Lending Volume in the state of Maryland section of Appendix D for the facts and data used to evaluate the bank's lending activity.

During this evaluation period, WNB made 32 home mortgage refinance loans and 69 consumer loans. This level of lending is considered poor given the bank's size and resources. Furthermore, the bank made no small farm, home improvement, home purchase or multifamily loans during this evaluation period. The bank did make two small loans to businesses. One loan was in a moderate-income tract and to a small business.

We did review consumer and refinance loans. More emphasis was placed on consumer loans rather than the home mortgage refinance loans as consumer loans represent 66.99 percent of all loans originated in this AA. WNB is not a predominant home mortgage lender in this AA. In 2013, WNB was ranked 52 out of 158 lenders in overall market share for total home mortgage refinance loans in the Salisbury AA. WNB had nominal total market share of 0.21 percent.

With respect to deposit market share in this AA, as of June 30, 2014, WNB ranked last out of 15 institutions with a nominal market share of 0.09 percent.

#### **Distribution of Loans by Income Level of the Geography**

Overall, WNB's geographic distribution of loans is poor. The geographic distribution of refinance loans is very poor. Whereas, the geographic distribution of consumer loans is poor.

##### ***Home Refinance Loans***

Refer to Table 4 in the state of Maryland section of Appendix D for the facts and data used to evaluate the geographic distribution of the bank's home mortgage loan refinance originations.

In 2012/2013, the bank made four loans. None of the loans were made in low- or moderate-income tracts. The lack of lending in 2012/2013 had a negative impact on the overall conclusions for this area.

In addition, in 2014/2015, WNB made no refinance loans in either low- or moderate-income geographies. Therefore, their market share is zero. This reflects very poor performance.

### ***Consumer Loans***

Refer to Table 13 in the state of Maryland section of Appendix D for the facts and data used to evaluate the geographic distribution of the bank's consumer loan originations.

In 2012/2013, the bank made 15 consumer loans. While this volume of lending is not sufficient to perform a meaningful analysis, we did review the distribution of these loans. None of these loans were made in low-income tracts and 6 were made in moderate-income tracts.

In 2014/2015, the bank's distribution of loans is adequate. In low-income tracts, their distribution of loans is significantly below the percentage of households in these geographies. Whereas, their distribution of loans in moderate-income tracts exceeds the percentage of households in these geographies.

### ***Lending Gap Analysis***

A lending gap analysis was not performed for this AA, as the lending volume in the Salisbury AA was insufficient to perform a meaningful analysis.

### ***Inside/Outside Ratio***

A substantial majority of the bank's loans in the state of Maryland were made inside their AAs. Overall, 97.2 percent of the bank's loans in the state of Maryland were made inside their AAs. By loan product, 98.9 percent of HMDA loans and 95.9 percent of consumer loans were made inside WNB's AAs. This assessment was based on lending within this state rather than the entire bank. The percentage of lending in this AA was a neutral factor in the overall analysis of the Lending Test.

### **Distribution of Loans by Income Level of the Borrower**

Overall, WNB's distribution of loans by income level of the borrower is poor. The borrower distribution of home refinance loans is poor. The distribution of consumer loans is adequate.

### ***Home Refinance Loans***

Refer to Table 10 in the state of Maryland section of Appendix D for the facts and data used to evaluate the borrower distribution of the bank's home mortgage refinance loan originations.

Overall, the distribution of refinance loans is poor.

For 2012/2013, the bank made four loans. No loans were made to low- or moderate-income borrowers. This lack of lending had a negative impact on the performance conclusion.

For 2014/2015, the bank's borrower distribution of loans is adequate. However, this conclusion is based on a review of 28 loans. Therefore, there was not a significant difference in the number of loans in each family category.

Their distribution of loans to low-income families is somewhat lower than the percentage of low-income families, which reflects poor performance.

Whereas, their distribution of loans to moderate-income families exceeds the percentage of moderate-income families. In addition, 2014 market share performance is good. Their market share to low-income borrowers is near their overall market share whereas their market share to moderate-income borrowers exceeds their overall market share.

### **Consumer Loans**

Refer to Table 13 in the state of Maryland section of Appendix D for the facts and data used to evaluate the borrower income distribution of the bank's consumer loan originations.

Overall, the bank's borrower distribution of consumer loans is adequate.

In 2012/2013, the bank made 15 consumer loans. While the volume of loans was not sufficient to perform a meaningful analysis, we did review the dispersion of loans in the AA. Of this total, six loans were made to low-income and six loans made to moderate-income borrowers. The low loan volume had a negative impact on the overall conclusion for this area.

For 2014/2015, the bank's borrower distribution of consumer loans is excellent. The distribution of loans to both low- and moderate-income households exceeds the percentage of these households in the AA.

Refer to Tables 10 in the state of Maryland AA section of Appendix D for the facts and data used to evaluate the borrower distribution of the bank's home mortgage refinance loan originations.

### **Community Development Lending**

Refer to Tables 1 Lending Volume in the state of Maryland section of Appendix D for the facts and data used to evaluate the bank's level of community development lending. The totals on this tables include all CD loans, including multifamily loans that qualified for CD purposes during the evaluation period.

Community development lending is adequate based on the opportunities and dollar amount of investments made in the AA. During this evaluation period, the bank made one CD loan for \$35,000 or 8 percent of allocated Tier One Capital.

The loan provided financing to a certified CDFI. The CDFI provides capital and technical assistance to organizations working to revitalize low-income neighborhoods and provide housing, services and jobs to underserved people. This level and responsiveness of CD lending is adequate and help meet identified job training, affordable housing and financial literacy needs in the AA. The loan was not innovative or flexible but did address some needs identified in the AA.

### **Product Innovation and Flexibility**

WNB has established a lending partnership with a nationwide mortgage lender in manner that ensures that a full array of mortgage financing products are available to serve the full market of qualified borrowers in the communities where the bank conducts business. These programs had a neutral impact on the bank's lending performance.

## **Conclusions for Areas Receiving Limited-Scope Reviews**

Based on limited-scope reviews, the bank's overall performance in the Baltimore and California-Lexington Park AAs is not inconsistent with the bank's performance in the full-scope AA.

Refer to Tables 1 through 13 in the state of Maryland section of Appendix D for the facts and data that support these conclusions.

## **INVESTMENT TEST**

WNB's performance under the Investment Test in Maryland is rated High Satisfactory. Based upon a full-scope review, the bank's performance in the Salisbury AA is good. In addition, performance in the limited-scope AAs was significant enough to increase the state rating.

## **Conclusions for Areas Receiving Full-Scope Reviews**

Refer to Table 14 in Appendix D for the facts and data used to evaluate the bank's level of qualified investments.

The level of CD investments is good. The bank has ample opportunity to make qualified CD investments in the Salisbury AA. During the evaluation period, WNB made two investments in this AA totaling \$330,000. This represents 75 percent of allocated Tier One Capital for the full-scope AA.

WNB's qualified investment was comprised of two MBSs where the underlying home mortgages were made to low- to moderate-income borrowers in the AA. While these investments were not innovative or flexible, they showed good responsiveness to meeting the affordable housing needs in the area.

## **Conclusions for Areas Receiving Limited-Scope Reviews**

Based on limited-scope reviews, the bank's performance under the Investment Test in the Baltimore-Columbia-Towson AA and the California-Lexington Park AA is greater than the bank's performance in the full-scope AA. WNB also has two prior period investments, totaling \$133,000, within the Baltimore-Columbia-Towson AA. The prior period investments continue to have a positive impact on the AA. Performance in the limited-scope AA did not impact the bank's overall Investment Test rating as the performance was significant enough.

Refer to Table 14 in Appendix D for the facts and data used to evaluate the bank's level of qualified investments.

## **SERVICE TEST**

The bank's performance under the Service Test in Maryland is rated Needs to Improve. Based on a full-scope review, the bank's performance in the Salisbury AA is adequate. However, the bank's state rating was negatively impacted by weaker performance in the limited-scope AAs.

## Conclusions for Areas Receiving Full-Scope Reviews

### Retail Banking Services

Refer to Table 15 in the Maryland AA section of Appendix D for the facts and data used to evaluate the distribution of the bank's branch delivery system and branch openings and closings.

The bank's delivery systems are reasonably accessible to geographies and individuals of different income levels in the AA.

WNB operates three banking offices in the Salisbury AA, all of which are located in Wal-Mart stores. Of these, none are located in low-income CTs and therefore the bank's branch distribution in these tracts is significantly lower than the percentage of the population in the AA. With 33.33 percent (1) of the locations in moderate-income CTs, the bank's percentage of branches exceeds the percentage of the population in the area. With 0.75 percent of the population residing in low-income tracts and 19.20 percent of the population in moderate-income tracts, we placed more emphasis on the bank's performance in moderate tracts in assessing overall performance in the full-scope AA.

Access to the bank's delivery systems are increased by the two remaining offices in the AA. These offices are located within five miles of the one low-income tract and five of the eight moderate-income tracts.

The bank's record of opening and closing branches has not adversely affected the accessibility of delivery systems, particularly in low- or moderate-income geographies or to low- or moderate-income families in the area. During this evaluation period, there were no banking offices opened or closed in this AA.

### Community Development Services

In the Salisbury AA, WNB's record of providing CD services is adequate based on the bank's responsiveness to the needs in the AA. We identified a significant number of non-profit organizations and one CDFI that operate in this AA.

During this evaluation period, WNB primarily provided financial literacy training using the FDIC's Money Smart program and held classes totaling 147 hours for low- and moderate-income individuals in the area. In addition, the bank had one employee who served on the board of an affordable housing non-profit organization.

## Conclusions for Areas Receiving Limited-Scope Reviews

Based on limited-scope reviews, the bank's performance under the Service Test in the Baltimore-Columbia-Towson MSA and the California-Lexington Park MSA is weaker than the bank's overall performance in the full-scope AA as the bank has no offices in low- or moderate-income tracts. These AAs represents 64.26 percent of the bank's deposits in the state. The weaker performance in these AAs was significant enough to negatively impact the overall state rating.

## **State of Mississippi**

**CRA Rating for Mississippi: Needs to Improve**  
**The Lending Test is rated: Low Satisfactory**  
**The Investment Test is rated: Needs to Improve**  
**The Service Test is rated: Needs to Improve**

The major factors that support this rating include:

- The overall level of lending is adequate. The geographic distribution of loans is adequate. The distribution of loans by income level is adequate.
- The level of CD loans is adequate.
- The level of CD investments is poor. The bank's volume of CD investments is nominal.
- The bank's delivery systems are reasonably accessible to geographies and individuals of different income levels in the AA. However, poor branch distribution in the limited-scope AAs had a negative impact on the state rating. The level of CD services is adequate.

### **Description of Institution's Operations in Mississippi**

WNB has 26 branches in the State of Mississippi. The State of Mississippi represents 3 percent of the bank's branching network and 0.60 percent of their deposit base. The bank has deposits of \$22 million in the state. WNB has a small presence in the state and is ranked number 98 out of 104 institutions with a deposit market share of 0.05 percent.

WNB has eight AAs in the state including the Eastern Non-MSA, Gulfport-Biloxi-Pascagoula MSA (Gulfport), Jackson MSA, Lincoln and Pike Counties, Memphis MSA, Northern Non-MSA, Warren County, and the Western Non-MSA.

Refer to the market profiles for the State of Mississippi in Appendix C for detailed demographics and other performance context information for AAs that received full-scope reviews.

### **Scope of Evaluation in Mississippi**

We selected one AA in the state to perform a full-scope review, the Gulfport AA. When comparing this AA to the bank's presence in the state, the Gulfport AA represents 23 percent of the branching network and 19 percent of its total deposit base. Performance in this area was given more emphasis than performance in limited-scope AAs.

Limited-scope reviews were performed for Eastern Non-MSA, Jackson MSA, Lincoln and Pike Counties, Memphis MSA, Northern Non-MSA, Warren County, and the Western Non-MSA.

Refer to the tables in Appendix D for more information on lending activity for the State of Mississippi.

## **LENDING TEST**

The bank's performance under the Lending Test in the state of Mississippi is rated Low Satisfactory. Based on a full-scope review, the bank's performance in the Gulfport AA is adequate.

## **Conclusions for Areas Receiving Full-Scope Reviews**

### **Lending Activity**

The bank's overall volume of loans in the Gulfport AA is adequate. Lending levels are adequate considering the bank's size, capacity and presence in the market. The bank has a small presence and deposit base in this AA.

Refer to Tables 1 Lending Volume in the state of Mississippi section of Appendix D for the facts and data used to evaluate the bank's lending activity.

During this evaluation period, WNB made 35 home mortgage refinance loans, 22 loans to small businesses, and 264 consumer loans. The bank made no home purchase or multifamily loans in this AA. The bank did make one small loan to a farm and this loan was made to a small farm. The bank also made one home improvement loan.

More emphasis was placed on consumer loans than home mortgage refinance loans as consumer loans represent 82.24 percent of all loans originated in this AA. Refinance and small loans to businesses were given equal emphasis. WNB is not a predominant home mortgage lender in this AA. In 2013, WNB was ranked 57 out of 174 lenders in overall market share for refinance loans in the Gulfport AA. WNB had nominal total market share of 0.14 percent. WNB made no small loans to businesses in 2013; therefore their market share was zero.

With respect to deposit market share in this AA, as of June 30, 2014, WNB ranked 14 out of 16 institutions with a nominal market share of 0.09 percent.

### **Distribution of Loans by Income Level of the Geography**

Overall, WNB's geographic distribution of loans is adequate. The geographic distribution of refinance loans is poor. The geographic distribution of small loans to businesses is very poor. As previously stated, more emphasis was given to the bank's consumer lending. The geographic distribution of consumer loans is good.

### ***Home Refinance Loans***

Refer to Tables 4 in the state of Mississippi section of Appendix D for the facts and data used to evaluate the geographic distribution of the bank's home mortgage loan refinance originations.



The geographic distribution of refinance loans is poor. However, this assessment is based on a small population of loans, eight loans in 2012/2013 and 27 in 2014/2015. Therefore, the number of loans in each geographic category did not vary significantly.

In 2012/2013, the bank made eight refinance loans. While the volume of loans was not sufficient to perform a meaningful analysis, we did review the distribution of these loans in the AA. One loan was made in a low-income tract and no loans were made in moderate tracts. The overall poor lending levels in the AA had a negative impact on the overall conclusions for this area as both analysis periods received equal emphasis.

For 2014/2015, the bank's geographic distribution loans is adequate. WNB made no loans in low-income tracts. This also reflects very poor performance. However, their distribution of loans in moderate-income tracts is near the percentage of owner-occupied units in these geographies and this reflects good performance. Their 2014 market share performance is also adequate. The bank had no market share in low-income tracts, since they made no loans in these tracts. However, in moderate-income tracts, their market share is near their overall market share of loans in all tracts.

### ***Small Loans to Businesses***

Refer to Tables 6 in the state of Mississippi section of Appendix D for the facts and data used to evaluate the geographic distribution of the bank's small loans to businesses.

The geographic distribution of loans to small businesses is very poor.

In 2012/2013, the bank made no small loans to businesses in this time frame and this reflects very poor performance.

For 2014/2015, the bank's geographic distribution of loans is also very poor. During this evaluation period, WNB made no small loans to businesses in either low- or moderate-income geographies. Therefore, the distribution of loans in these tracts is significantly below the percentage of businesses that operate in low- and moderate-income tracts. The bank had no market share for 2014 as they made no loans in either low- or moderate-income tracts.

### ***Consumer Loans***

Refer to Tables 13 in the state of Mississippi section of Appendix D for the facts and data used to evaluate the geographic distribution of the bank's consumer loan originations.

The geographic distribution of consumer loans is good.

For 2012/2013, the bank's geographic distribution of consumer loans is adequate. The distribution of loans in low-income geographies is lower than the percentage of households in these geographies. The distribution of loans in moderate-income tracts is near the percentage of households in these geographies. Market share data is not available for consumer loans.

For 2014/2015, the bank's geographic distribution of consumer loans is excellent. The distribution of loans in both low- and moderate-income tracts exceeds the percentage of households in these geographies. Market share data is not available for consumer loans.

### ***Lending Gap Analysis***

We analyzed WNB's lending distribution within the Gulfport AA to determine if any unexplained, conspicuous gaps existed in the bank's home mortgage, small business, and consumer loan activity. We used lending distribution reports to identify geographies where the bank did not make any loans. We also reviewed the demographics of geographies where no loans were made. We considered loan distributions, branch locations, and demographic information. As a result of this analysis, no unexplained conspicuous gaps were found in either the home mortgage, small business, or consumer loan lending activity.

### ***Inside/Outside Ratio***

A majority of the bank's loans in the state of Mississippi were made inside their AAs. Overall, 88.8 percent of the bank's loans in the state of Mississippi were made inside their AAs. By loan product, 96.1 percent of HMDA loans and 87.5 percent of consumer loans were made inside WNB's AAs. This assessment was based on lending within this state rather than the entire bank. The percentage of lending in this AA was a neutral factor in the overall analysis of the Lending Test.

### **Distribution of Loans by Income Level of the Borrower**

Overall, WNB's distribution of loans by income level of the borrower is adequate. The bank's distribution of refinance loans is poor. The distribution of loans to small businesses is adequate. As previously stated, more emphasis was given to the bank's consumer lending. The distribution of consumer loans is excellent.

### ***Home Refinance Loans***

Refer to Tables 10 in the state of Mississippi AA section of Appendix D for the facts and data used to evaluate the borrower distribution of the bank's home mortgage refinance loan originations.

The borrower distribution of refinance loans is poor. Poor lending levels in 2012/2013 had a negative impact on the performance conclusion. The conclusion is a blend of the bank's performance in both analysis periods.

For 2012/2013, the bank made eight loans. One loan was made to a low-income borrower and two loans made to a moderate-income borrower.

For 2014/2015, the bank's borrower distribution of loans is adequate. The bank made no loans to low-income families in this AA and this reflects very poor performance. However, their distribution of loans to moderate-income families exceeds the percentage of moderate-income families in the AA. The bank's 2014 market share performance is also adequate. The bank made no loans to low-income borrowers in 2014. However, their market share to moderate-income borrowers significantly exceeds their overall market share of loans to all borrowers.

### ***Small Loans to Businesses***

Refer to Tables 11 in the state of Mississippi section of Appendix D for the facts and data used to evaluate the borrower distribution of the bank's loans to small businesses.

The borrower distribution of small loans to businesses is adequate. This conclusion considered the bank's performance in both analysis periods and blended these performances. Poor lending in the 2012/2013 analysis period had a negative impact on the overall conclusion for this area.

For 2012/2013, the bank made no loans and this reflects very poor performance.

However, the bank's distribution of loans for 2014/2015 is excellent. This assessment is based on a small population of 22 loans. WNB's distribution of small loans to businesses exceeds the percent of small businesses in the AA. The bank is also meeting the lending needs of small businesses. Based on 2014 market share information, WNB's market share to small businesses significantly exceeds their overall market share of loans to all businesses.

### ***Consumer Loans***

Refer to Tables 13 in the state of Mississippi section of Appendix D for the facts and data used to evaluate the borrower income distribution of the bank's consumer loan originations.

The borrower distribution of consumer loans is excellent.

For 2012/2013, the bank's borrower distribution of consumer loans is excellent. The distribution of loans to both low- and moderate-income households exceeds the percentage of these households in the AA. Market share data is not available for consumer loans.

For 2014/2015, the bank's borrower distribution of consumer loans is also excellent. The distribution of loans to both low- and moderate-income households exceeds the percentage of low- and moderate-income households in the AA.

### **Community Development Lending**

Refer to Tables 1 Lending Volume in the state of Mississippi section of Appendix D for the facts and data used to evaluate the bank's level of community development lending. The totals on this table include all CD loans, including multifamily loans that qualified for CD purposes during the evaluation period.

The level of CD lending is adequate and had a positive impact on the lending performance in the Gulfport AA. During this evaluation period, the bank originated five CD loans in the AA totaling \$135,000 or 21 percent of allocated Tier One Capital. Based on the responsiveness to meeting the identified needs in the community and the level of loans made, CD lending is adequate.

- Two loans totaling \$60,000 were made to organizations that provided training and financing for small businesses for startups and established businesses and community development services in low- and moderate-income neighborhoods.

- The other three loans totaling \$75,000 were made to a foundation for crime prevention for senior citizens. The loans were not considered complex or innovative. These loans are responsive to the need for training, financial education, and financing for small business loans, which are identified as needs of the AA by a community contact.

The primary objective of this foundation is to reduce crime in the nation's senior housing facilities and to provide ongoing, effective crime prevention programs that promote safe, secure and high quality of life environments for senior housing residents. WNB provided supporting documentation that shows the bank adjusted its community development strategy and changed the collateral with this foundation. The existing collateral of two Ginnie Mae MBS pools benefits LMI households. The loan funds help ensure a safe and secure crime-free residence to low- to moderate-income residents. The loan meets the regulatory definition of a CD loan.

### **Product Innovation and Flexibility**

WNB has established a lending partnership with a nationwide mortgage lender in manner that ensures that a full array of mortgage financing products are available to serve the full market of qualified borrowers in the communities where the bank conducts business. These programs had a neutral impact on the bank's lending performance.

### **Conclusions for Areas Receiving Limited-Scope Reviews**

Based on limited-scope reviews, the bank's overall performance in the Eastern Non-MSA, Jackson MSA, Lincoln and Pike Counties, Northern Non-MSA, and Western Non-MSA AAs is adequate and not inconsistent with the bank's performance in the full-scope AA.

The bank's performance in the Memphis MSA and the Warren County AAs is very poor and significantly below the bank's overall performance in the full-scope AA. The weaker performance in the Memphis MSA and the Warren County AAs can be attributed to the minimal presence the bank has in these AAs. Both AAs only have one branch. However, the performance in these AAs was not significant enough to impact the overall Lending Test rating for the state.

Refer to Tables 1 through 13 in the state of Mississippi section of Appendix D for the facts and data that support these conclusions.

### **INVESTMENT TEST**

The bank's performance under the Investment Test for Mississippi is rated Needs to Improve. Based upon a full-scope review, the bank's performance in the Gulfport AA is poor.

### **Conclusions for Areas Receiving Full-Scope Reviews**

Refer to Table 14 in Appendix D for the facts and data used to evaluate the bank's level of qualified investments.

The level of CD investments is poor. The bank has ample opportunity to make qualified CD investments in the Gulfport AA and during the evaluation period, WNB only made three investments in this AA totaling \$7,000. These investments were comprised entirely of grants and donations to three local organizations that provided community development services to low- to moderate-income individuals.

The investments were not considered innovative or flexible in nature and demonstrated poor responsiveness to addressing the identified needs in the AA. This investment level represents 1 percent of allocated Tier One Capital for the full-scope AA.

## **Conclusions for Areas Receiving Limited-Scope Reviews**

Based on limited-scope reviews, the bank's performance under the Investment Test in the Jackson AA, Lincoln and Pike Counties AA, Memphis AA, Northern Non-MSA AA, and Warren County AA is greater than the bank's performance in the full-scope AA. Performance in the Eastern Non-MSA AA is not inconsistent with the bank's performance in the full-scope AA. The performance in the Western Non-MSA is weaker than the bank's performance in the full-scope AA. The combined performance in the limited-scope AA did not impact the bank's overall Investment Test rating.

Refer to Table 14 in Appendix D for the facts and data used to evaluate the bank's level of qualified investments.

## **SERVICE TEST**

The bank's performance under the Service Test in Mississippi is rated Low Satisfactory. Based on a full-scope review, the bank's performance in the Gulfport AA is adequate. Also, weaker performance in the limited-scope AAs had a negative impact on the overall state rating.

## **Conclusions for Areas Receiving Full-Scope Reviews**

### **Retail Banking Services**

Refer to Table 15 in the Mississippi AA section of Appendix D for the facts and data used to evaluate the distribution of the bank's branch delivery system and branch openings and closings.

The bank's delivery systems are reasonably accessible to geographies and individuals of different income levels in the AA.

WNB operates six banking offices in the Gulfport AA, all of which are located in Wal-Mart stores. Of these, none are located in low-income CTs and therefore the bank's branch distribution in these tracts is significantly lower than the percentage of the population in the AA. With 33.33 percent (2) of the banking offices in moderate-income CTs, the bank's percentage of branches exceeds the percentage of the population in the area. About 2.76 percent of the population resides in low-income tracts and 13.90 percent of the population resides in moderate-income tracts.

In determining the overall performance in the full-scope AA, more emphasis was given to their performance in moderate-income tracts given the low population percentages in the low-income geographies.

Access to the bank's delivery systems is increased with branches that are located near low- and moderate-income tracts. The bank has four offices that are within five miles of all four low-income tracts. They also have five branches that are within five miles of all eight moderate-income tracts.

No branches were opened or closed in the full-scope AA during this evaluation period. Therefore, the bank's record of opening and closing branches has not adversely affected the accessibility of delivery systems in this AA, particularly in low- or moderate-income CTs.

## **Community Development Services**

In the Gulfport AA, WNB's record of providing CD services is adequate based on the ample opportunities in the AA and the responsiveness to the identified needs in the community. We identified several non-profit organizations and one CDFI that operate in this AA. During this evaluation period, WNB primarily provided financial literacy training using the FDIC's Money Smart program and held classes totaling 277 hours for low- and moderate-income individuals in the area.

In addition, the bank had eight officers who served as board or committee members for four nonprofits organizations. These non-profits provide services to underprivileged children, persons with disabilities, early childhood education, as well as other services that benefit low- to moderate-income individuals and the homeless.

Specific examples are as follows:

- Serve on the board or finance committee for an organization that provides assistance to the homeless and to people who suffer from drug addiction.
- Serve as president of the advisory board for an organization that provide services for seniors, veterans, homeless and people with disabilities.
- Serve as a board member, president and chairman of the board, finance and marketing committee for an organization that provides after school care and activities for children of LMI families.

## **Conclusions for Areas Receiving Limited-Scope Reviews**

Based on limited-scope reviews, the bank's performance under the Service Test in the Jackson MSA, Memphis MSA, Northern Non-MSA and Western Non-MSA is not inconsistent with the bank's performance in the full-scope AA. These AAs represent 39.26 percent of the bank's deposits in the state.

Performance in the Eastern Non-MSA, Lincoln and Pike Counties, and Warren County is weaker than the bank's performance in the full-scope AA.

The bank has no banking offices in either low or moderate-income tracts. In addition, of the 26 banking offices in the state, the bank has no offices in low-income tracts and 8 offices in moderate-income tracts, which represents 31 percent. Performance in the limited-scope AAs was poor and significant enough to negatively impact the bank's overall performance in the state.

## State of New York

**CRA Rating for New York: Satisfactory**  
**The Lending Test is rated: Low Satisfactory**  
**The Investment Test is rated: High Satisfactory**  
**The Service Test is rated: Needs to Improve**

The major factors that support this rating include:

- The overall level of lending is adequate. The geographic distribution of loans is poor and the distribution of loans by borrower income level is adequate.
- The level of CD loans was adequate.
- The level of CD investments is good.
- Retail banking services are unreasonably inaccessible to portions of the AA, particularly low- and moderate-income geographies and individuals. The level of CD services is adequate.

### Description of Institution's Operations in New York

WNB has 16 branches in the state of New York. The state of New York represents 2.14 percent of the bank's branching network and 0.41 percent of their deposit base. The bank has deposits of \$15 million in the state. WNB has a small presence in the state and is ranked number 211 out of 221 institutions with a deposit market share of 0.00 percent.

WNB has eight AAs in the state including the Albany-Schenectady-Troy MSA, Buffalo-Cheektowaga-Niagara Falls MSA, Elmira MSA, Rochester MSA, Syracuse MSA, Utica-Rome MSA (Utica), Watertown-Fort Drum MSA, and the Western Non-MSA.

Refer to the market profiles for the New York in Appendix C for detailed demographics and other performance context information for AAs that received full-scope reviews.

### Scope of Evaluation in New York

We selected one AA in the state to perform a full-scope review, the Utica AA. When comparing this AA to the bank's presence in the state, the Utica AA represents 13 percent of the bank's branching network and 12 percent of its total deposit base. Performance in this area was given more emphasis than performance in limited-scope AAs.

Limited-scope reviews were performed for Albany-Schenectady-Troy MSA, Buffalo-Cheektowaga-Niagara Falls MSA, Elmira MSA, Rochester MSA, Syracuse MSA, Watertown-Fort Drum MSA, and the Western Non-MSA.

Refer to the tables in Appendix D for more information on lending activity for the State of New York.



## **LENDING TEST**

The bank's performance under the Lending Test in the state of New York is rated Low Satisfactory. Based on a full-scope review, the bank's performance in the Utica AA is adequate.

### **Conclusions for Areas Receiving Full-Scope Reviews**

#### **Lending Activity**

The bank's overall volume of loans in the Utica AA is adequate. Lending levels are adequate considering the bank's size, capacity and presence in the market. The bank has two banking offices and a small deposit base in this AA.

Refer to Tables 1 Lending Volume in the state of New York section of Appendix D for the facts and data used to evaluate the bank's lending activity.

During this evaluation period, WNB made 29 refinance loans and 117 consumer loans. This level of lending is adequate. The bank made no home purchase, small farm loans or multifamily loans in this AA. The bank did make one home improvement loan and five small loans to businesses. Four of the five small loans to businesses were made to small businesses. The volume of home improvement and small loans to businesses was not sufficient to perform a meaningful analysis.

More emphasis was placed on consumer loans rather than refinance loans as consumer loans represent 77.48 percent of all loans originated in this AA. WNB is not a predominant home mortgage lender in this AA. In 2013, WNB was ranked 37 out of 117 lenders in overall market share for total home mortgage refinance loans in the Utica AA. WNB had nominal total market share of 0.23 percent.

With respect to deposit market share in this AA, as of June 30, 2014, WNB ranked 11 out of 12 institutions with a nominal market share of 0.08 percent. Considering the bank's deposit market share and their refinance market share, their lending activity is adequate.

#### **Distribution of Loans by Income Level of the Geography**

Overall, WNB's geographic distribution of loans is poor. The geographic distribution of refinance loans is very poor. The geographic distribution of consumer loans is adequate. As previously stated, more emphasis was given to the bank's consumer lending.

##### ***Home Refinance Loans***

Refer to Tables 4 in the state of New York section of Appendix D for the facts and data used to evaluate the geographic distribution of the bank's home mortgage loan refinance originations.

The geographic distribution of refinance loans is very poor.

In 2012/2013, the bank made seven refinance loans. None of the loans were made in low- or moderate-income tracts. This reflects very poor performance.

For 2014/2015, the bank's geographic distribution of loans is poor. WNB made no loans in low-income CTs which demonstrates very poor performance. Furthermore, their distribution of loans in moderate-income census tracts is poor and somewhat lower than the percentage of owner-occupied units in these geographies. Their 2014 market share performance is adequate. WNB made no loans in low-income tracts in 2014. However, in moderate-income tracts, their market share exceeds their overall market share of refinance loans in all tracts.

### ***Consumer Loans***

Refer to Tables 13 in the state of New York section of Appendix D for the facts and data used to evaluate the geographic distribution of the bank's consumer loan originations.

The geographic distribution of consumer loans is adequate.

For 2012/2013, the bank's geographic distribution of consumer loans is adequate. However, this assessment is based on a small population of 29 consumer loans. Therefore, the number of loans in each geography did not vary significantly. Their distribution of loans in low-income tracts is somewhat lower than the percentage of households in these geographies. This reflects poor performance. However, their distribution of loans in moderate-income tracts significantly exceeds the percentage of households in these geographies. Market share data is not available for consumer loans.

For 2014/2015, the bank's geographic distribution of consumer loans is also adequate. The distribution of loans in low-income tracts is somewhat lower than the percentage of households in these geographies. This also reflects poor performance. Their distribution of loans in moderate-income tracts significantly exceeds the percentage of households in these geographies.

### ***Lending Gap Analysis***

We analyzed WNB's lending distribution within the Utica AA to determine if any unexplained, conspicuous gaps existed in the bank's refinance and consumer loan activity. We used lending distribution reports to identify geographies where the bank did not make any loans. We also reviewed the demographics of geographies where no loans were made. We considered loan distributions, branch locations, and demographic information. As a result of this analysis, no unexplained conspicuous gaps were found in either the home mortgage or consumer loan lending activity.

### ***Inside/Outside Ratio***

A majority of the bank's loans in the state of New York were made inside their AAs. Overall, 85 percent of the bank's loans in the state of New York were made inside their AAs. By loan product, 59 percent of HMDA loans and 95 percent of consumer loans were made inside WNB's AAs. This assessment was based on lending within this state rather than the entire bank. The percentage of lending in this AA was a neutral factor in the overall analysis of the Lending Test.

## **Distribution of Loans by Income Level of the Borrower**

Overall, WNB's distribution of loans by income level of the borrower is adequate. The borrower distribution of home refinance loans is poor. The borrower distribution of consumer loans is excellent. More emphasis was given to the bank's consumer lending.

### ***Home Refinance Loans***

Refer to Tables 10 in the state of New York AA section of Appendix D for the facts and data used to evaluate the borrower distribution of the bank's home mortgage refinance loan originations.

The borrower distribution of refinance loans is poor. Poor lending performance for 2012/2013 had a negative impact on the overall lending conclusion for this performance test.

For 2012/2013, the volume of loans was insufficient to perform a meaningful analysis. However, we did review the dispersion of the bank's loans. The bank made seven refinance loans. No loans were made to low-income borrowers and three were made to moderate-income borrowers.

For 2014/2015, the bank's borrower distribution of loans is adequate. The distribution of loans to low-income borrowers is somewhat lower than the percentage of low-income families in the AA. This reflects poor performance. However, the distribution of loans to moderate-income families is excellent as their distribution of loans exceeds the percentage of moderate-income families in the AA. The bank's market share performance is also adequate. Based on 2014 market share information, WNB made no loans in low-income tracts. However, their market share in moderate-income tracts significantly exceeds their overall market share of loans in all tracts.

### ***Consumer Loans***

Refer to Tables 13 in the state of New York AA section of Appendix D for the facts and data used to evaluate the borrower income distribution of the bank's consumer loan originations.

The borrower distribution of consumer loans is excellent.

For 2012/2013, the bank's borrower distribution of consumer loans is excellent. This assessment is based on a small population of 29 loans. The distribution of loans to both low- and moderate-income households exceeds the percentage of these households in the AA. Market share data is not available for consumer loans.

For 2014/2015, the bank's borrower distribution of consumer loans is also excellent. The distribution of loans to both low- and moderate-income households exceeds the percentage of low- and moderate-income households in the AA. Market share data is not available for consumer loans.

## **Community Development Lending**

Refer to Tables 1 Lending Volume in the state of New York section of Appendix D for the facts and data used to evaluate the bank's level of community development lending. The totals on this table include all CD loans, including multifamily loans that qualified for CD purposes during the evaluation period.

The level of CD lending is adequate and had a positive impact on lending performance in the Utica AA. During this evaluation period, the bank originated one CD loan for \$50,000 in this AA. This amount represents 18 percent of allocated Tier One Capital. The loan provided financing to a non-profit, public benefit corporation to stimulate growth in distressed areas. The loan was not considered complex or innovative. Based on community contact information, there is some opportunity to make qualified CD loans in this area. Based on the available opportunities and the bank's loan volume, the bank's CD lending is adequate.

## **Product Innovation and Flexibility**

WNB has established a lending partnership with a nationwide mortgage lender in manner that ensures that a full array of mortgage financing products are available to serve the full market of qualified borrowers in the communities where the bank conducts business. These programs had a neutral impact on the bank's lending performance.

## **Conclusions for Areas Receiving Limited-Scope Reviews**

Based on limited-scope reviews, the bank's overall performance in the Albany MSA, Buffalo MSA, Elmira MSA, Rochester MSA, Syracuse MSA, and Western Non-MSA AAs is not inconsistent with the bank's performance in the full-scope AA.

The bank performance in the Watertown MSA is weaker than their performance in the full-scope AA. The weaker performance in the Watertown MSA can be attributed to nominal lending activity. However, the performance in this AA was not significant enough to impact the overall Lending Test rating for the state as it represents 7.12 percent of the deposits in the state.

Refer to Tables 1 through 13 in the state of New York section of Appendix D for the facts and data that support these conclusions.

## **INVESTMENT TEST**

WNB's performance under the Investment Test in New York is rated High Satisfactory. Based upon a full-scope review, the bank's performance in the Utica AA is good.

## **Conclusions for Areas Receiving Full-Scope Reviews**

Refer to Table 14 in Appendix D for the facts and data used to evaluate the bank's level of qualified investments.

The level of CD investments is good. The bank has ample opportunity to make qualified CD investments in the Utica AA. During the evaluation period, WNB made four investments totaling \$289,000. This represents 104 percent of allocated Tier One Capital for the full-scope AA. WNB's qualified investments were comprised of four MBSs secured by mortgages to low-to moderate-income borrowers throughout the AA.

These investments were not innovative or flexible but did address the affordable housing needs in the AA and demonstrates good responsiveness to meeting the needs of the AA.

## **Conclusions for Areas Receiving Limited-Scope Reviews**

Based on limited-scope reviews, the bank's performance under the Investment Test in the Buffalo-Niagara Falls AA and Rochester AA is greater than the bank's performance in the full-scope AA. The volume and quality of the bank's investments are greater in these AAs.

Performance in the Albany-Schenectady-Troy AA and Syracuse AA is not inconsistent with the bank's performance in the full-scope AA.

The performance in the Elmira AA, Western Non-MSA AA and Watertown-Fort Drum AA is weaker than the bank's performance in the full-scope AA. These AAs represent 37.39 percent of the state's deposits. WNB's investment amounts in these AAs were smaller. The combined performance in the limited-scope AAs did not impact the bank's overall Investment Test rating.

Refer to Table 14 in Appendix D for the facts and data used to evaluate the bank's level of qualified investments.

## **SERVICE TEST**

The bank's performance under the Service Test in New York is rated Needs to Improve. Based on a full-scope review, the bank's performance in the Utica AA is poor.

## **Conclusions for Areas Receiving Full-Scope Reviews**

### **Retail Banking Services**

Refer to Table 15 in the New York AA section of Appendix D for the facts and data used to evaluate the distribution of the bank's branch delivery system and branch openings and closings.

The bank's delivery systems are unreasonably inaccessible to portions of the bank's AA, particularly low- and moderate-income geographies and individuals.

WNB operates two banking offices in the Utica AA, all of which are located in Wal-Mart stores. Of these, none are located in low- or moderate-income CTs. Therefore, the percentage of branches in low- and moderate-income tracts is significantly lower than the percentage of the population that resides in these tracts. The population residing in the low-income tracts is 6.71 percent and 14.14 percent for moderate-income tracts.

When we considered those offices that are near low- or moderate-income tracts, the accessibility of their delivery systems did not increase significantly. The two banking offices are within five miles of one of six low-income tracts and five of 15 moderate-income tracts.

There were no branches opened or closed in this AA during this evaluation period. Therefore, the bank's branch openings and closings have not adversely affected low- or moderate-income individuals or geographies.

## **Community Development Services**

Based on the bank's responsiveness to the identified needs in the Utica AA, WNB's record of providing CD services is adequate. We identified several CD organizations and one CDFI that operate in this AA.

During this evaluation period, WNB primarily provided financial literacy training using the FDIC's Money Smart program and held classes totaling 61 hours for low- and moderate-income individuals in the area. In addition, the bank had two employees that served as board members for a non-profit affordable housing organization.

## **Conclusions for Areas Receiving Limited-Scope Reviews**

Based on limited-scope reviews, the bank's performance under the Service Test in the Buffalo-Cheektowaga-Niagara Falls MSA, Watertown-Fort Drum MSA, and the Western Non-MSA is not inconsistent with the bank's overall Needs to Improve performance in the full-scope area.

The performance in the Albany-Schenectady-Troy MSA, Elmira MSA, Rochester MSA and the Syracuse MSA is stronger than the bank's performance in the full-scope AA. The stronger performance is attributable to a stronger branch distribution in the low- and moderate-income tracts. However, when we reviewed the bank's distribution throughout the entire state, the bank's overall performance is poor. Of the 16 banking offices in the state, the bank has no banking offices in low-income tracts and only 4 offices in moderate-income tracts. The combined performance in the limited-scope areas with stronger performance was not significant enough to increase the overall state rating.

## State of North Carolina

**CRA Rating for North Carolina: Satisfactory**  
**The Lending Test is rated: Low Satisfactory**  
**The Investment Test is rated: Outstanding**  
**The Service Test is rated: Low Satisfactory**

The major factors that support this rating include:

- The overall level of lending is adequate. The geographic distribution of loans is adequate. Whereas, the distribution of loans by borrower income level is good.
- The level of CD loans is good.
- The level of CD investments is excellent based on the volume and quality of investments made.
- Retail banking services are reasonably accessible to geographies and individuals of different income levels in the AA. The level of CD services is adequate.

### Description of Institution's Operations in North Carolina

WNB has 73 branches in the state of North Carolina. The state of North Carolina represents 10 percent of the bank's branching network and 2.83 percent of their deposit base. The bank has deposits of \$105 million in the state. WNB has a small presence in the state and is ranked number 71 out of 100 institutions with a deposit market share of 0.03 percent.

WNB had 23 AAs in the state including the Anson and Stanly Counties, Asheville MSA, Burlington MSA, Carteret County, Cleveland and Rutherford Counties, Duplin County, Durham-Chapel Hill MSA, Fayetteville MSA, Goldsboro MSA, Granville and Vance Counties, Greensboro-High Point MSA, Greenville MSA, Hickory-Lenoir-Morganton MSA, Jacksonville MSA, Mitchell County, New Bern MSA, Northern Non-MSA, Pasquotank County, Raleigh MSA, Rocky Mount MSA, South Central Non-MSA, Surry and Wilkes Counties, and the Winston-Salem MSA. When the bank closed branches in the counties of Granville and Vance, and in Mitchell, the two AAs were removed from the state total AAs.

Refer to the market profiles for the State of North Carolina in Appendix C for detailed demographics and other performance context information for AAs that received full-scope reviews.

### Scope of Evaluation in North Carolina

We selected one AA in the state to perform a full-scope review, the Winston-Salem AA. When comparing this AA to the remainder of the state, the Winston-Salem AA represents 10 percent of North Carolina's branching network and 10 percent of its deposit base. Performance in this area was given more emphasis than performance in limited-scope AAs.

Limited-scope reviews were performed for Anson and Stanly Counties, Asheville MSA, Burlington MSA, Carteret County, Cleveland and Rutherford Counties, Duplin County, Durham-Chapel Hill MSA, Fayetteville MSA, Goldsboro MSA, Greensboro-High Point MSA, Greenville MSA, Hickory-Lenoir-Morganton MSA, Jacksonville MSA, New Bern MSA, Northern Non-MSA, Pasquotank County, Raleigh MSA, Rocky Mount MSA, South Central Non-MSA, Surry and Wilkes Counties, and the Winston-Salem MSA.

Refer to the tables in Appendix D for more information on lending activity for the State of North Carolina.

## **LENDING TEST**

The bank's performance under the Lending Test in the state of North Carolina is rated Low Satisfactory. Based on a full-scope review, the bank's performance in the Winston-Salem MSA AA is adequate.

### **Conclusions for Areas Receiving Full-Scope Reviews**

#### **Lending Activity**

The bank's overall volume of loans in the Winston AA is adequate. Lending levels are adequate considering the bank's size, capacity and presence in the market. The bank operates seven branches in this AA and has a small deposit base.

Refer to Tables 1 Lending Volume in the state of North Carolina section of Appendix D for the facts and data used to evaluate the bank's lending activity.

During this evaluation period, WNB made 48 refinance loans, 26 loans to small businesses, and 425 consumer loans. The bank made no small farm loans or multifamily loans. The bank did make one home purchase loan and they made one home improvement loan to a moderate-income borrower.

Given that consumer loans represent 85.17 percent of all loans originated in this AA, we place the vast majority of the emphasis on this product. Refinance and small loans to businesses received equal emphasis. WNB is not a predominant home mortgage lender in this AA. In 2013, WNB was ranked 46 out of 242 lenders in overall market share for total home mortgage refinance loans in the Winston-Salem AA. WNB had nominal total market share of 0.24 percent.

With respect to deposit market share in this AA, as of June 30, 2014, WNB ranked last out of 11 institutions with a nominal market share of 0.13 percent.

#### **Distribution of Loans by Income Level of the Geography**

Overall, WNB's geographic distribution of loans is adequate. The geographic distribution of refinance loans is adequate. The geographic distribution of small loans to businesses is adequate. The geographic distribution of consumer loans is good. As previously stated, more emphasis was given to the bank's consumer lending in determining the overall conclusion.



### ***Home Refinance Loans***

Refer to Tables 4 in the state of North Carolina section of Appendix D for the facts and data used to evaluate the geographic distribution of the bank's home mortgage loan refinance originations.

The geographic distribution of refinance loans is adequate. This assessment is based on a small population of loans, 26 loans for 2012/2013 and 22 for 2014/2015. Therefore, there was not a significant difference in the number of loans in each geography.

For 2012/2013, the bank's geographic distribution of loans is poor. WNB made no loans in low-income geographies. Furthermore, their distribution of loans in moderate-income geographies is somewhat lower than the percentage of owner-occupied units in these geographies. This reflects poor performance. Also, the bank's market share is also poor. Based on 2013 market share data, WNB made no loans in low-income tracts and their market share in moderate-income tracts is somewhat lower than their market share of loans to all borrowers.

For 2014/2015, the bank's geographic distribution of loans is excellent. The distribution of loans in both low- and moderate-income geographies exceeds the percentage of owner-occupied housing units in these geographies. Furthermore, the bank's market share performance is also excellent. Based on 2014 market share information, the bank's market share in both low- and moderate-income tracts exceeds their overall market share of refinance loans in all census tracts.

### ***Small Loans to Businesses***

Refer to Tables 6 in the state of North Carolina section of Appendix D for the facts and data used to evaluate the geographic distribution of the bank's small loans to businesses.

The geographic distribution of small loans to businesses is adequate. Poor lending performance in 2012/2013 had a negative impact on the performance conclusion for this area.

For 2012/2013, the bank made no small loans to businesses. This reflects very poor performance.

For 2014/2015, the bank's geographic distribution of small loans to businesses is excellent. However, this assessment is based on a small population of 26 loans and the number of loans in the different geographies did not vary significantly. Their distribution of small loans to businesses in both low- and moderate-income geographies exceeds the percentage of businesses in these geographies. The bank's 2014 market share performance is also excellent. Their market share in both low- and moderate-income tracts exceeds their overall market share of loans in the AA.

### ***Consumer Loans***

Refer to Tables 13 in the state of North Carolina section of Appendix D for the facts and data used to evaluate the geographic distribution of the bank's consumer loan originations.

The geographic distribution of consumer loans is good.

For 2012/2013, the bank's geographic distribution of consumer loans is adequate. WNB made no loans in low-income geographies. This reflects very poor performance. However, the bank's distribution of loans in moderate-income tracts significantly exceeds the percentage of households in these geographies. Market share data is not available for consumer loans.

For 2014/2015, the bank's geographic distribution of consumer loans is excellent. The distribution of loans in both low- and moderate-income geographies exceeds the percentage of households in these geographies.

### ***Lending Gap Analysis***

We analyzed WNB's lending distribution within the Winston-Salem AA to determine if any unexplained, conspicuous gaps existed in the bank's home mortgage, small business, and consumer loan activity. We used lending distribution reports to identify geographies where the bank did not make any loans. We also reviewed the demographics of geographies where no loans were made. We considered loan distributions, branch locations, and demographic information. As a result of this analysis, no unexplained conspicuous gaps were found in either the home mortgage, small business, or consumer loan lending activity.

### ***Inside/Outside Ratio***

A substantial majority of the bank's loans in the state of North Carolina were made inside their AAs. Overall, 96.1 percent of the bank's loans in the state of North Carolina were made inside their AAs. By loan product, 99.9 percent of HMDA loans, 96.1 percent of small business loans, and 95.5 percent of consumer loans were made inside WNB's AAs. This assessment was based on lending within this state rather than the entire bank. The percentage of lending in this AA was a neutral factor in the overall analysis of the Lending Test.

### **Distribution of Loans by Income Level of the Borrower**

Overall, WNB's distribution of loans by income level of the borrower is good. The borrower distribution of home refinance loans is adequate. The borrower distribution of small loans to businesses is adequate. As previously stated, more emphasis was given to the bank's consumer lending. The borrower distribution of consumer loans is excellent.

### ***Home Refinance Loans***

Refer to Tables 10 in the state of North Carolina section of Appendix D for the facts and data used to evaluate the borrower distribution of the bank's home mortgage refinance loan originations.

The borrower distribution of refinance loans is adequate. As previously stated, the population of refinance loans was small with 26 loans in 2012/2013 and 22 in 2014/2015. Therefore, the number of loans in each income level category did not vary significantly.

For 2012/2013, the bank's borrower distribution of loans is poor. The bank made no loans to low-income borrowers in this AA. This reflects very poor performance.

However, the bank's distribution of loans to moderate-income borrowers is good as the bank's distribution of loans is near the percentage of low-income families in the AA. Their 2013 market share is adequate as their market share to low-income borrowers is zero but their moderate-income market share exceeds their overall market share of loans to all borrowers.

For 2014/2015, the bank's borrower distribution of loans is excellent. The distribution of loans to both low- and moderate-income families exceeds the percentage of these families in the AA. Their 2014 market share performance is also excellent. Their market share to both low- and moderate-income borrowers exceed their overall market share of loans to all borrowers.

### ***Small Loans to Businesses***

Refer to Tables 11 in the state of North Carolina AA section of Appendix D for the facts and data used to evaluate the borrower distribution of the bank's small loans to businesses.

The distribution of small loans to businesses is adequate.

For 2012/2013, the bank made no small loans to businesses in this AA. This poor performance had a negative impact on the overall performance conclusion.

For 2014/2015, the bank's borrower distribution of loans is excellent. This assessment is based on a small population of 26 loans. WNB's dispersion of small loans to businesses exceeds the percent of small businesses in the AA. Their 2014 market share of loans to small businesses exceeds their overall market share of loans to all businesses. This further illustrates their responsiveness to meeting the needs of small businesses in the AA.

### ***Consumer Loans***

Refer to Tables 13 in the state of North Carolina AA section of Appendix D for the facts and data used to evaluate the borrower income distribution of the bank's consumer loan originations.

The borrower distribution of consumer loans is excellent.

For 2012/2013, the bank's borrower distribution of consumer loans is excellent. The distribution of loans to both low- and moderate-income households exceeds the percentage of these households in the AA. Market share data is not available for consumer loans.

For 2014/2015, the bank's borrower distribution of consumer loans is also excellent. The distribution of loans to both low- and moderate-income households exceeds the percentage of low- and moderate-income households in the AA. Market share data is not available for consumer loans.

### **Community Development Lending**

Refer to Tables 1 Lending Volume in the state of North Carolina section of Appendix D for the facts and data used to evaluate the bank's level of community development lending.

The totals on this table include all CD loans, including multifamily loans that qualified for CD purposes during the evaluation period.

The level of Community development lending is good had a positive impact on lending performance in the Winston AA.

During this evaluation period, the bank originated three CD loans in the AA totaling \$118,000 or 10 percent of allocated Tier One Capital. These loans were made to the following organizations:

- One loan for \$75,000 to an organization that provides for community development services in low- and moderate-income neighborhoods.
- One loan for \$32,500 to regional lending consortium that provides permanent financing for apartment communities, which have been awarded Federal Low-Income Housing Tax credits.
- One loan for \$10,000 to an organization that provides small business loans and financial training to start-up and existing businesses.

These loans were not considered innovative or complex but were very responsive to meeting the affordable housing and small business needs in the AA. Affordable housing and business development are identified needs in most communities.

### **Product Innovation and Flexibility**

WNB has established a lending partnership with a nationwide mortgage lender in manner that ensures that a full array of mortgage financing products are available to serve the full market of qualified borrowers in the communities where the bank conducts business. These programs had a neutral impact on the bank's lending performance.

### **Conclusions for Areas Receiving Limited-Scope Reviews**

Based on limited-scope reviews, the bank's overall performance in the Asheville MSA, Burlington MSA, Cleveland and Rutherford Counties, Durham MSA, Greenville MSA, Raleigh MSA, and South Central Non-MSA AAs is not inconsistent with the bank's performance in the full-scope AA. These AAs represent 52.76 percent of the deposits in the state.

The bank performance in the Anson and Stanly Counties, Carteret County, Duplin County, Fayetteville MSA, Goldsboro MSA, Greensboro MSA, Hickory MSA, Jacksonville MSA, New Bern MSA, Northern Non-MSA, Pasquotank County, and Rocky Mount MSA AAs is weaker than the bank's performance in the full-scope AA. The weaker performance is attributed to poor lending levels and weaker distribution of loans to low- and moderate-income tracts and individuals. However, the performance in these areas was not significant enough to impact the overall Lending Test rating for the state.

Refer to Tables 1 through 13 in the state of North Carolina section of Appendix D for the facts and data that support these conclusions.

## INVESTMENT TEST

WNB's performance under the Investment Test in North Carolina is rated Outstanding. Based upon a full-scope review, the bank's performance in the Winston AA is excellent.

### Conclusions for Areas Receiving Full-Scope Reviews

Refer to Table 14 in Appendix D for the facts and data used to evaluate the bank's level of qualified investments.

WNB's level of investments is excellent. The bank has ample opportunity to make qualified CD investments in the Winston AA as there are numerous organizations that operate in this area and during the evaluation period, WNB made twelve investments in this AA totaling approximately \$1 million. The bank's total investment amount represented 82 percent of allocated Tier One Capital. Based on the responsiveness to the identified needs in the community and dollar amount of investments made, the level of investments is excellent.

WNB's qualified investments were comprised of grants, donations, certificate of deposits and MBS. Specific investments made during this evaluation period include:

- Four MBSs for \$466,000 where the majority of the underlying home mortgages were made to low- or moderate-income borrowers in the AA.
- Five grants or donations totaling \$27,000 to organizations in the AA that provided community development services to low- to moderate-income individuals.
- Three certificate of deposits totaling \$573,000 with a local minority-owned bank to help them meet the credit needs of the AA.

The investments were not considered innovative or flexible in nature but were responsive to the needs of the AA. Affordable housing and community services are identified needs in this AA. WNB also has \$86,000 of prior period, long-term equity investment in the Winston AA. The prior period investment continues to have a positive impact on the affordable housing needs in the AA.

### Conclusions for Areas Receiving Limited-Scope Reviews

Based on limited-scope reviews, the bank's performance under the Investment Test in the Raleigh AA is greater than the bank's performance in the full-scope AA. In addition, there was a \$188,000 prior period, long-term equity investment still outstanding. The prior period investment continues to have a positive impact on the AA.

Performance in the Asheville AA, Durham-Chapel Hill AA, and Northern Non-MSA AA is not inconsistent with the bank's performance in the full-scope AA. In addition, WNB has three prior period, long-term equity investments, for \$114,000, in the Greensboro-High Point AA. The prior period investments continue to have a positive impact on the AA.

Performance in the Anson and Stanly County AA, Burlington AA, Carteret County AA, Cleveland and Rutherford Counties AA, Duplin County AA, Fayetteville AA, Goldsboro AA, Greensboro-High Point AA, Greenville AA, Hickory-Lenoir-Morganton AA, Jacksonville AA, New Bern AA, Pasquotank County AA, Rocky Mount AA, South Central Non-MSA AA and Surry and Wilkes Counties AA is adequate but weaker than the bank's performance in the full-scope AA as the volume of investments was lesser.

Refer to Table 14 in Appendix D for the facts and data used to evaluate the bank's level of qualified investments.

## **SERVICE TEST**

The bank's performance under the Service Test in North Carolina is rated Low Satisfactory. Based on a full-scope review, the bank's performance in the Winston AA is adequate.

## **Conclusions for Areas Receiving Full-Scope Reviews**

### **Retail Banking Services**

Refer to Table 15 in the North Carolina AA section of Appendix D for the facts and data used to evaluate the distribution of the bank's branch delivery system and branch openings and closings.

The bank's delivery systems are reasonably accessible to geographies and individuals of different income levels in the AA.

WNB operates seven banking offices in the Winston AA, all of which are located in Wal-Mart stores. Of these, none are located in low-income CTs and therefore the bank's branch distribution in these tracts is significantly lower than the percentage of the population in the AA. With 42.86 percent (3) of the locations in moderate-income CTs, the bank's percentage of branches exceeds the percentage of the population in the area. About 5.96 percent of the population resides in low-income tracts and 19.94 percent of the population in moderate-income tracts.

Access to the bank's delivery systems is increased by banking offices that are near low- or moderate-income tracts. The bank has five offices are located within five miles of at least 10 of the 13 low-income tracts and six offices are located near 21 of the 28 moderate-income tracts.

During the evaluation period, there were no banking offices closed and one office opened in the Winston AA. Therefore, the branch opening and closings did not adversely affect the accessibility of delivery systems, particularly in low- or moderate-income geographies or to low- or moderate-income families in the area.

### **Community Development Services**

In the Winston AA, WNB's record of providing CD services is adequate based on their responsiveness to the needs in this AA.

We identified several non-profit organizations that operate in this AA. During this evaluation period, WNB primarily provided financial literacy training using the FDIC's Money Smart program and held classes totaling 252 hours for low- and moderate-income individuals in the area.

In addition, five bank officers served on board or committee for various nonprofits. Some examples of the financial services provided include:

- Serve as a board member for a CDC.
- Serve as loan committee for a CDFI that provides low interest loans to LMI families.
- Serve as board secretary for a non-profit organization that provide services to low- and moderate-income individuals and underprivileged children.

### **Conclusions for Areas Receiving Limited-Scope Reviews**

Based on limited-scope reviews, the bank's performance under the Service Test in the Asheville MSA, Durham-Chapel Hill MSA, Raleigh MSA and South Central Non-MSA is not inconsistent with the bank's overall performance in the full-scope AA. These AAs represent 31.72 percent of the state's total deposits.

Performance in the Anson and Stanly Counties, Burlington MSA, Greensboro-High Point MSA, Hickory-Lenoir-Morganton MSA and Rocky Mount MSA is stronger than their performance in the full-scope AA. These AAs represent 32.81 percent of the state's total deposits.

Performance in the Carteret County, Cleveland and Rutherford Counties, Duplin County, Fayetteville MSA, Goldsboro MSA, Greenville MSA, Jacksonville MSA, New Bern MSA, Northern Non-MSA, Pasquotank County, and the Surry and Wilkes Counties is weaker than their performance in the full-scope AA. The weaker performance is attributable to a weaker branch distribution in the low- and moderate-income tracts. Overall, the limited-scope AAs did not impact the bank's overall performance in the state.

## State of Ohio

### **CRA Rating for Ohio: Satisfactory**

**The Lending Test is rated: Low Satisfactory**

**The Investment Test is rated: Outstanding**

**The Service Test is rated: Needs to Improve**

The major factors that support this rating include:

- The overall level of lending is adequate. The geographic distribution of loans is adequate. The distribution of loans by borrower income level is good.
- The level of CD loans is adequate.
- The level of CD investments is excellent.
- The bank's delivery systems are reasonably accessible to geographies and individuals of different income levels in the full-scope AA. The level of CD services in the full-scope AA is also adequate. However, poor branch distribution in the limited-scope AAs had a negative impact on the Service Test rating for the state.

### **Description of Institution's Operations in Ohio**

WNB has 69 branches throughout the state of Ohio. The state of Ohio represents 10 percent of the bank's branching network and 2.03 percent of their deposit base. Based on 2014 FDIC data, the bank has \$75 million in deposits in the state. WNB has a moderate presence in the state and is ranked number 166 out of 249 institutions with a deposit market share of 0.03 percent.

WNB has 18 AAs in the state including the Akron MSA, Canton-Massillon MSA, Central Non-MSA, Cleveland-Elyria MSA, Columbiana County, Columbus MSA, Dayton MSA, Erie and Ottawa Counties, Lima MSA, Mansfield MSA, Northwest Non-MSA, Preble County, Southern Non-MSA, Springfield MSA, Toledo MSA (Toledo AA), Western Non-MSA, Wheeling MSA, and the Youngstown-Warren-Boardman MSA.

Refer to the market profiles for the state of Ohio in Appendix C for detailed demographics and other performance context information for AAs that received full-scope reviews.

### **Scope of Evaluation in Ohio**

We selected one AA in the state to perform a full-scope review, the Toledo AA. When comparing this AA to the bank's presence in the state, the Toledo AA represents 10 percent of Ohio's branching network and 10 percent of its total deposit base. Performance in this area was given more emphasis than performance in limited-scope AAs.



Limited-scope reviews were performed for Akron MSA, Canton-Massillon MSA, Central Non-MSA, Cleveland-Elyria MSA, Columbiana County, Columbus MSA, Dayton MSA, Erie and Ottawa Counties, Lima MSA, Mansfield MSA, Northwest Non-MSA, Preble County, Southern Non-MSA, Springfield MSA, Western Non-MSA, Wheeling MSA, and the Youngstown-Warren-Boardman MSA.

Refer to the tables in Appendix D for more information on lending activity for the State of Ohio.

## **LENDING TEST**

The bank's performance under the Lending Test in the state of Ohio AA is rated Low Satisfactory. Based on a full-scope review, the bank's performance in the Toledo AA is adequate.

## **Conclusions for Areas Receiving Full-Scope Reviews**

### **Lending Activity**

The bank's overall volume of loans in the Toledo AA is adequate. Lending levels are adequate considering the bank's size, capacity and presence in the market. The bank has seven offices in this AA and has a small deposit base of \$7 million.

Refer to Tables 1 Lending Volume in the state of Ohio AA section of Appendix D for the facts and data used to evaluate the bank's lending activity.

During this evaluation period, WNB made 50 home refinance loans, 22 loans to small businesses, and 311 consumer loans. The bank made no small farm or multifamily loans. The bank did make one home purchase loan to a low-income borrower and four home improvement loans, of which two were made to low-income borrowers and one made to a moderate-income borrower.

More emphasis was placed on consumer loans rather than refinance loans as consumer loans represent 70.36 percent of all loans originated in this AA. Refinance loans were given slightly more emphasis than small loans to businesses as WNB made more refinance loans than small loans to businesses. WNB is not a predominant home mortgage lender in this AA. In 2013, WNB was ranked 71 out of 214 lenders for refinance loans in the Toledo AA with a nominal market share of 0.09 percent.

With respect to deposit market share in this AA, as of June 30, 2014, WNB ranked last out of 19 institutions with a nominal market share of 0.07 percent. When we compared the bank's refinance market share to their deposit market share, the bank's lending activity is adequate.

### **Distribution of Loans by Income Level of the Geography**

Overall, WNB's geographic distribution of loans is adequate. The geographic distribution of both refinance loans and small loans to businesses is poor. As previously stated, more emphasis was given to the bank's consumer lending. The geographic distribution of consumer loans is good.

**Home Refinance Loans**

Refer to Tables 4 in the state of Ohio section of Appendix D for the facts and data used to evaluate the geographic distribution of the bank's home mortgage loan refinance originations.

The geographic distribution of refinance loans is poor. This conclusion is a blend of the bank's performance in both analysis periods. Poor performance in 2012/2013 had a negative impact on the overall performance conclusion for this area.

For 2012/2013, the bank made 14 refinance loans. No loans were made in low- or moderate-income tracts. While the volume of loans is not sufficient to perform a meaningful analysis, we did review the distribution of these loans. This reflects very poor performance.

For 2014/2015, the bank's geographic distribution of loans is good. However, this assessment is based on a small population of 36 loans. Therefore, there was not a significant variance in the number of loans in each tract. The distribution of loans in both low- and moderate-income geographies is near the percentage of owner-occupied units in these geographies. This demonstrates good performance. Whereas, their market share performance is excellent. In both low- and moderate-income tracts, the bank's market share exceeds their overall market share of loans in all tracts.

**Small Loans to Businesses**

Refer to Tables 6 in the state of Ohio section of Appendix D for the facts and data used to evaluate the geographic distribution of the bank's small loans to businesses.

The geographic distribution of small loans to businesses is poor. Poor performance in 2012/2013 had a negative impact on the overall performance conclusion for this area.

For 2012/2013, the bank made no loans in this AA during the evaluation period. This reflects very poor performance and had a negative impact on the overall conclusion.

For 2014/2015, the bank's geographic distribution of loans is adequate. This assessment is based on a small population of 22 loans. Therefore, there was not a significant variance in the actual number of loans in each geography. The bank made no loans to small businesses in low-income geographies. Their distribution of small loans to businesses in moderate-income geographies exceeds the percentage of businesses in these geographies. The bank's market share performance is also adequate. Based on 2014 market share information, the bank's market share in low-income tracts is zero. This reflects poor performance. However, their market share in moderate-income tracts is near their overall market share of loans in all tracts and this represents good performance.

**Consumer Loans**

Refer to Tables 13 in the state of Ohio section of Appendix D for the facts and data used to evaluate the geographic distribution of the bank's consumer loan originations.

The geographic distribution of consumer loans is good.

For 2012/2013, the bank's geographic distribution of consumer loans is good. Their distribution of loans in both low- and moderate-income geographies is near the percentage of households in these geographies. Market share data is not available for consumer loans.

For 2014/2015, the bank's geographic distribution of consumer loans is excellent. Their distribution of loans in both low- and moderate-income geographies exceeds the percentage of households in these tracts. Market share data is not available for consumer loans.

### ***Lending Gap Analysis***

We analyzed WNB's lending distribution within the Toledo MSA AA to determine if any unexplained, conspicuous gaps existed in the bank's home mortgage, small business, and consumer loan activity. We used lending distribution reports to identify geographies where the bank did not make any loans. We also reviewed the demographics of geographies where no loans were made. We considered loan distributions, branch locations, and demographic information. As a result of this analysis, no unexplained conspicuous gaps were found in either the home mortgage, small business, or consumer loan lending activity.

### ***Inside/Outside Ratio***

A substantial majority of the bank's loans were made inside their AAs. Overall, 98.3 percent of the bank's loans in the state of Ohio were made inside their AAs. By loan product, 99.8 percent of HMDA loans, 99.6 percent of small business loans, and 97.9 percent of consumer loans were made inside WNB's AAs. This assessment was based on lending within this state rather than the entire bank. The percentage of lending in this AA was a neutral factor in the overall analysis of the Lending Test.

### **Distribution of Loans by Income Level of the Borrower**

Overall, WNB's distribution of loans by income level of the borrower is good. The borrower distribution of home refinance loans is adequate. The borrower distribution of loans to small businesses is adequate. As previously stated, more emphasis was given to the bank's consumer lending. The borrower distribution of consumer loans is excellent.

### ***Home Refinance Loans***

Refer to Tables 10 in the state Ohio AA section of Appendix D for the facts and data used to evaluate the borrower distribution of the bank's home mortgage refinance loan originations.

The borrower distribution of refinance loans is adequate. Poor performance in 2012/2013 had a negative impact on the overall conclusion.

For 2012/2013, the bank made 14 refinance loans. While the volume of loans was not sufficient to perform a meaningful analysis, we did review the dispersion of loans. One loan made to a low-income borrower and another made to a moderate-income borrower. This reflects poor performance.

For 2014/2015, the bank's borrower distribution of loans is excellent. Their distribution of loans to both low- and moderate-income families exceeds the percentage these families in the AA.

Furthermore, their 2014 market share performance is also excellent. Their market share to both low- and moderate-income borrowers significantly exceeds their overall market share of loans to all borrowers.

### ***Small Loans to Businesses***

Refer to Tables 11 in the state of Ohio section of Appendix D for the facts and data used to evaluate the borrower distribution of the bank's small loans to businesses.

The borrower distribution of small loans to businesses is adequate. Poor performance in 2012/2013 had a negative impact on the overall conclusion.

For 2012/2013, the bank made no small loans to businesses. This reflects very poor performance.

For 2014/2015, the bank's borrower distribution of loans is excellent. WNB's distribution of small loans to businesses exceeds the percent of small businesses in the AA. In addition, the bank's 2014 market share to small businesses exceed their overall market share of loans to all businesses. This further indicates that the bank is meeting the lending needs of small businesses in the AA.

### ***Consumer Loans***

Refer to Tables 13 in the state of Ohio section of Appendix D for the facts and data used to evaluate the borrower income distribution of the bank's consumer loan originations.

The borrower distribution of consumer loans is excellent.

For 2012/2013, the bank's borrower distribution of consumer loans is excellent. The distribution of loans to both low- and moderate-income households exceeds the percentage of both low- and moderate-income households in the AA. Market share data is not available for consumer loans.

For 2014/2015, the bank's borrower distribution of consumer loans is also excellent. The distribution of loans to both low- and moderate-income households exceeds the percentage of both low- and moderate-income households in the AA. Market share data is not available for consumer loans.

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

Refer to Tables 1 Lending Volume in the state of Ohio section of Appendix D for the facts and data used to evaluate the bank's level of community development lending. The totals on this table include all CD loans, including multifamily loans that qualified for CD purposes during the evaluation period.

The level of CD lending is adequate and had a positive impact on lending performance in the Toledo AA. The bank originated four CD loans in the AA totaling \$250,000 or 24 percent of allocated Tier One Capital.

These loans are responsive to the need for affordable housing for low- to moderate-income individuals and stabilization needs, which are both identified as needs of the AA.

- One loan for \$100,000 to an organization that help residents and community-based organizations rebuild low- and moderate-income neighborhoods.
- Three loans for \$150,000 to a foundation for crime prevention for senior citizens. The loans were not considered complex or innovative.

The primary objective of this foundation is to reduce crime in the nation's senior housing facilities and to provide ongoing, effective crime prevention programs that promote safe, secure and high quality of life environments for senior housing residents. WNB provided supporting documentation that shows the bank adjusted its community development strategy and changed the collateral with this foundation. The existing collateral of two Ginnie Mae MBS pools benefits LMI households. The loan funds help ensure a safe and secure crime-free residence to low- to moderate-income residents. The loan meets the regulatory definition of a CD loan.

### **Product Innovation and Flexibility**

WNB has established a lending partnership with a nationwide mortgage lender in manner that ensures that a full array of mortgage financing products are available to serve the full market of qualified borrowers in the communities where the bank conducts business. These programs had a neutral impact on the bank's lending performance.

### **Conclusions for Areas Receiving Limited-Scope Reviews**

Based on limited-scope reviews, the bank's overall performance in the Cleveland MSA and Columbus MSA AAs is adequate and not inconsistent with the bank's Low Satisfactory performance in the state.

The bank's performance in the Akron MSA, Canton MSA, Central Non-MSA, Columbiana County, Dayton MSA, Erie/Ottawa Counties, Lima MSA, Mansfield MSA, Northwest Non-MSA, Preble County, Southern-Non-MSA, Springfield MSA, Western Non- MSA, Wheeling MSA, and Youngstown MSA AAs is weaker than the bank's performance in the full-scope AA.

This weaker performance is attributed to poorer distribution of loans in low- and moderate-income tracts and individuals. However, the performance in these AAs was not significant enough to impact the overall Lending Test rating for the state.

Refer to Tables 1 through 13 in the state of Ohio section of Appendix D for the facts and data that support these conclusions.

### **INVESTMENT TEST**

WNB's performance under the Investment Test in Ohio is rated Outstanding. Based upon a full-scope review, the bank's performance in the Toledo AA is excellent.

## Conclusions for Areas Receiving Full-Scope Reviews

Refer to Table 14 in Appendix D for the facts and data used to evaluate the bank's level of qualified investments.

The level of CD investments is excellent. The bank has ample opportunity to make qualified CD investments in the Toledo AA. During the evaluation period, WNB made six investments in the Toledo AA totaling \$2 million. The bank's investment amount represents 194 percent of allocated Tier One Capital.

Specific information regarding the bank's current investments follows:

- Two certificate of deposits totaling \$480,000 with a local community development credit union to help meet the credit needs of the Toledo AA.
- Three grants and donations totaling \$11,000 to an organization that provides community development services to low- and moderate-income individuals.
- One DUS balloon MBS for \$1,500,000. FNMA DUS securities are backed by affordable housing multifamily loan pools that usually consist of a single loan/single purpose entity.

These investments were not considered innovative or flexible in nature but were highly responsive to the community service and affordable housing needs in the AA.

In addition, WNB has three prior period investments totaling \$453,000 that remain outstanding. These prior period, long-term equity investments supported small business and affordable housing needs in the AA and they continue to have a significant positive impact on the AA.

## Conclusions for Areas Receiving Limited-Scope Reviews

Based on limited-scope reviews, the bank's performance under the Investment Test in the Columbiana County AA, and Dayton AA is not inconsistent with the bank's performance in the full-scope AA.

Performance in Akron MSA, Canton-Massillon AA, Central Non-MSA, Cleveland-Elyria AA, Columbus AA, Erie and Ottawa Counties AA, Lima AA, Mansfield AA, Northwest Non-MSA AA, Preble County AA, Southern Non-MSA AA, Springfield AA, Western Non-MSA AA, Wheeling AA, and Youngstown-Warren-Boardman AA is weaker than the bank's performance in the full-scope AA. The bank's investment levels were smaller in these areas than the full-scope area. While the amount of investments in these limited-scope AAs was smaller, they were adequate therefore the performance in these areas did not impact the overall state rating.

Refer to Table 14 in Appendix D for the facts and data used to evaluate the bank's level of qualified investments.

## SERVICE TEST

The bank's performance under the Service Test in Ohio is rated Needs to Improve. Based on a full-scope review, the bank's performance in the Toledo MSA AA is adequate.

However, poor performance in the limited-scope AAs had a negative impact on the bank's overall performance in the state.

## **Conclusions for Areas Receiving Full-Scope Reviews**

### **Retail Banking Services**

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

The bank's delivery systems are reasonably accessible to geographies and individuals of different income levels in the AA.

WNB operates seven banking offices in the Toledo MSA AA, all of which are located in Wal-Mart stores. Of these, none are located in low-income CTs and therefore the bank's branch distribution in these tracts is significantly lower than the percentage of the population in the area, which is 9.43 percent. With 14.30 percent (1) of the locations in moderate-income CTs, the bank's percentage of branches is near to the percentage of the population in the area, which is 16.63 percent. The majority of the population, approximately 73.08 percent, resides in middle- and upper-income CTs.

Access to the bank's delivery systems is increased with banking offices that are near low- or moderate-income tracts. The bank has four offices that are within a five mile radius of at least 25 of the 27 low-income tracts and 27 of 30 moderate-income tracts.

The bank's record of opening and closing branches has not adversely affected the accessibility of delivery systems, particularly in low- or moderate-income geographies or to low- or moderate-income families in the area. During this evaluation period, there were no banking offices opened or closed in the AA.

### **Community Development Services**

In the Toledo MSA, WNB's record of providing CD services is adequate based on their size and available resources. We identified a significant number of non-profit organizations and CDFIs that operate in this AA.

During this evaluation period, WNB primarily provided financial literacy training using the FDIC's Money Smart program and held classes totaling 196 hours for low- and moderate-income individuals in the area.

In addition, five bank officers provided financial services to three organizations that support affordable housing or CD services throughout the AA. These individuals served on the board, fundraising or as chairman for these organizations.

## **Conclusions for Areas Receiving Limited-Scope Reviews**

Based on limited-scope reviews, the bank's performance under the Service Test in the Canton-Massillon MSA, Cleveland-Elyria MSA, Dayton MSA, Southern Non-MSA and Western Non-MSA MSA is stronger than the bank's overall performance in the full-scope AA. These AAs represent 35.16 percent of the state's total deposits.

Performance in the Akron MSA, Central Non-MSA, Columbiana County, Columbus MSA, Erie and Ottawa Counties, Lima MSA, Mansfield MSA, Northwest Non-MSA, Preble County, Springfield MSA, Wheeling MSA, and the Youngstown-Warren-Boardman MSA is weaker than the performance in the full-scope AA. The weaker performance is attributable to a weaker branch distribution in the low- and moderate- income tracts. These AAs represent 54.58 percent of the state's total deposits and had a negative impact on the state's overall performance.

Furthermore, when we reviewed the bank's branch distribution throughout the state of Ohio, their performance is poor. The bank has 69 banking offices in the state. Of this total, one office is located in a low-income tract (1.45 percent) and 12 are located in a moderate-income tract (17.39 percent).



## State of Pennsylvania

**CRA Rating for Pennsylvania: Satisfactory**  
**The Lending Test is rated: Low Satisfactory**  
**The Investment Test is rated: Outstanding**  
**The Service Test is rated: Needs to Improve**

The major factors that support this rating include:

- The overall level of lending is adequate. The geographic distribution of loans is good. The distribution of loans by borrower income level is adequate.
- The level of CD loans is adequate.
- The level of CD investments is excellent.
- Retail banking services are reasonably accessible to geographies and individuals of different income levels in the full-scope AA. However, weaker performance in the limited-scope AAs decreased the Service Test rating.

### Description of Institution's Operations in Pennsylvania

WNB has 40 branches in the state of Pennsylvania. The state of Pennsylvania represents 5 percent of the bank's branching network and 1.22 percent of their deposit base. Based on 2014 FDIC data, the bank has deposits of \$45 million in the state. WNB has a small presence in the state and is ranked number 203 out of 231 institutions with a deposit market share of 0.01 percent.

WNB had 20 AAs in the state including the Allentown-Bethlehem-Easton MSA, Altoona MSA, Chambersburg-Waynesboro MSA, East Stroudsburg MSA, Harrisburg-Carlisle MSA, Lancaster MSA, Lebanon MSA, Montgomery County-Bucks County-Chester County MD (Montgomery County), Northumberland, Schuylkill and Union Counties, Pittsburgh MSA, Reading MSA, Scranton-Wilkes-Barre-Hazleton MSA, State College MSA, Warren and Venango Counties, and the York-Hanover MSA. However, the bank closed banking offices in Allentown-Bethlehem-Easton and State College thereby eliminating these AAs in 2014.

Refer to the market profiles for the state of Pennsylvania in Appendix C for detailed demographics and other performance context information for AAs that received full-scope reviews.

### Scope of Evaluation in Pennsylvania

We selected one AA in the state to perform a full-scope review, the Montgomery County AA. When comparing this AA to the bank's presence in the state, the Montgomery County AA represents 10 percent of Pennsylvania's branching network and 5 percent of its total deposit base. Performance in this area was given more emphasis than performance in limited-scope AAs.

Limited-scope reviews were performed for Altoona MSA, Chambersburg-Waynesboro MSA, East Stroudsburg MSA, Harrisburg-Carlisle MSA, Lancaster MSA, Lebanon MSA, Northumberland, Schuylkill and Union Counties, Pittsburgh MSA, Reading MSA, Scranton-Wilkes-Barre-Hazleton MSA, Warren and Venango Counties, and the York-Hanover MSA.

Refer to the tables in Appendix D for more information on lending activity for the state of Pennsylvania.

## **LENDING TEST**

The bank's performance under the Lending Test in the state of Pennsylvania is rated Low Satisfactory. Based on a full-scope review, the bank's performance in the Montgomery County AA is adequate.

## **Conclusions for Areas Receiving Full-Scope Reviews**

### **Lending Activity**

The bank's overall volume of loans in the Montgomery County AA is adequate. Lending levels are adequate given the competition in the AA for HMDA loans and considering the bank's size, capacity and presence in the market. The bank has four banking offices in this AA and has a small deposit base and competition in this area is strong.

Refer to Tables 1 Lending Volume in the state of Pennsylvania section of Appendix D for the facts and data used to evaluate the bank's lending activity.

During this evaluation period, WNB made 55 home mortgage refinance loans and 112 consumer loans. The bank made no home purchase, home improvement or small farm loans in this AA. The bank did make 10 small loans to businesses and two of these loans were made in low-income tracts and one loan made in a moderate-income tract. Also, seven of the loans was made to small businesses.

More emphasis was placed on consumer loans rather than refinance loans as consumer loans represent 63.67 percent of all loans originated in this AA. WNB is not a predominant home mortgage lender in this AA. In 2013, WNB was ranked 260 out of 539 lenders in overall market share for refinance loans in the Montgomery County AA. WNB had nominal total market share of 0.02 percent.

With respect to deposit market share in this AA, as of June 30, 2014, WNB ranked 61 out of 64 institutions with a market share of 0.00 percent. Given the bank's refinance market share and strong competition in the area, the bank's level of lending is adequate.

### **Distribution of Loans by Income Level of the Geography**

Overall, WNB's geographic distribution of loans is good. The geographic distribution of refinance loans is adequate. As previously stated, more emphasis was given to the bank's consumer lending. The geographic distribution of consumer loans is good.

### ***Home Refinance Loans***

Refer to Tables 4 in the state of Pennsylvania section of Appendix D for the facts and data used to evaluate the geographic distribution of the bank's home mortgage loan refinance originations.

The geographic distribution of refinance loans is adequate. However, this assessment is based on a small population of loans, 30 loans in 2012/2013 and 25 loans in 2014/2015. Thereby, the actual number of loans in each geographic category did not vary significantly.

For 2012/2013, the bank's geographic distribution of loans is poor. The bank made no loans in low-income geographies, which reflects very poor performance. However, we did consider the fact that only 0.86 percent of owner-occupied units are in these tracts which somewhat mitigates the bank's poor performance. In moderate-income tracts, the bank's performance is good as their distribution of loans in moderate-income tracts is near the percentage of owner-occupied units in these geographies. The bank's market share is poor as WNB made no loans in either low- or moderate-income tracts in 2013.

For 2014/2015, the bank's geographic distribution of loans is excellent. The bank's distribution of loans in both low- and moderate-income geographies exceeds the percentage of owner-occupied units in these tracts. In addition, the bank's 2014 market share performance is also excellent. Their market share in both low- and moderate-income tracts exceed their overall market share of refinance loans in all tracts.

### ***Consumer Loans***

Refer to Tables 13 in the state of Pennsylvania section of Appendix D for the facts and data used to evaluate the geographic distribution of the bank's consumer loan originations.

The geographic distribution of consumer loans is good.

For 2012/2013, the bank's geographic distribution of consumer loans is good. This assessment is based on a small population of 22 loans and the actual number of loans in each tract category did not vary significantly. Therefore, the bank's 2014/2015 performance was given more consideration than their 2012/2013 performance. The bank's distribution of loans in low-income geographies exceeds the percentage of households in these geographies. Their distribution of loans in moderate-income geographies is near the percentage of households in these geographies. Market share data is not available for consumer loans.

For 2014/2015, the bank's geographic distribution of consumer loans is excellent. Their distribution of loans in both low- and moderate-income geographies exceeds the percentage of households in these geographies. Market share data is not available for consumer loans.

### ***Lending Gap Analysis***

We analyzed WNB's lending distribution within the Montgomery County AA to determine if any unexplained, conspicuous gaps existed in the bank's home mortgage and consumer loan activity.

We used lending distribution reports to identify geographies where the bank did not make any loans. We also reviewed the demographics of geographies where no loans were made. We considered loan distributions, branch locations, and demographic information. As a result of this analysis, no unexplained conspicuous gaps were found in either the refinance or consumer loan lending activity.

### ***Inside/Outside Ratio***

A majority of the bank's loans were made inside their AAs. Overall, 78 percent of the bank's loans in the state of Pennsylvania were made inside their AAs. By loan product, 56 percent of HMDA loans and 92 percent of consumer loans were made inside WNB's AAs. This assessment was based on lending within this state rather than the entire bank. The percentage of lending in this AA was a neutral factor in the overall analysis of the Lending Test.

### **Distribution of Loans by Income Level of the Borrower**

Overall, WNB's distribution of loans by income level of the borrower is adequate. The borrower distribution of refinance loans is good. The bank's distribution of consumer loans is also adequate. As stated previously, more consideration was given to consumer loans in arriving at the overall conclusion.

### ***Home Refinance Loans***

Refer to Tables 10 in the state of Pennsylvania section of Appendix D for the facts and data used to evaluate the borrower distribution of the bank's home mortgage refinance loan originations.

The borrower distribution of refinance loans is good. As stated previously, the population of refinance loans is small as the bank made 30 loans in 2012/2013 and 25 loans in 2014/2015. Therefore, the number of loans made to the various categories of families did not vary significantly.

For 2012/2013, the borrower distribution of loans is adequate. Their distribution of loans to low-income families is lower than the percentage of low-income families in the AA. This reflects adequate performance. Whereas, their distribution of loans to moderate-income families is poor and somewhat lower than the percentage of moderate-income families. The bank's 2013 market share to both low- and moderate-income borrowers is excellent and exceeds their overall market share of refinance loans to all borrowers.

For 2014/2015, the bank's borrower distribution of loans is excellent. Their distribution of loans to both low and moderate-income families exceeds the percentage of these families in the AA. Their 2014 market share performance is also excellent. Their market share to low-income borrowers significantly exceeds their overall market share of loans to all borrowers. Whereas, their market share of loans to moderate-income borrowers is near their overall market share.

## **Consumer Loans**

Refer to Tables 13 in the state of Pennsylvania section of Appendix D for the facts and data used to evaluate the borrower income distribution of the bank's consumer loan originations.

The borrower distribution of consumer loans is adequate.

For 2012/2013, the bank's borrower distribution of consumer loans is excellent. This assessment is based on a small population of 22 loans therefore there was not a significant difference in the number of loans to the income categories. Therefore, we gave less consideration to this performance than the bank's 2014/2015 performance. Their distribution of loans to both low and moderate-income households significantly exceeds the percentage of both low and moderate-income households in the AA. Market share data is not available for consumer loans.

For 2014/2015, the bank's borrower distribution of consumer loans is adequate. Their distribution of loans to low-income households is excellent and significantly exceeds the percentage of low-income households. However, the distribution of loans to moderate-income households is somewhat lower than the percentage of moderate-income households. This reflects poor performance.

## **Community Development Lending**

Refer to Tables 1 Lending Volume in the state of Pennsylvania section of Appendix D for the facts and data used to evaluate the bank's level of community development lending. The totals on this table include all CD loans, including multifamily loans that qualified for CD purposes during the evaluation period.

The level of community development lending is adequate and had a neutral impact on the lending performance in the Montgomery County AA. During this evaluation period, the bank originated one CD loan in the AA totaling \$40,000 or 15 percent of allocated Tier One Capital.

The loan provided financing to a certified CDFI for capital and technical assistance to organizations working to revitalize low-income neighborhoods and provide housing, services and jobs to underserved people. The loan was not considered complex or innovative but showed adequate responsiveness to meeting the redevelopment needs in the AA.

## **Product Innovation and Flexibility**

WNB has established a lending partnership with a nationwide mortgage lender in manner that ensures that a full array of mortgage financing products are available to serve the full market of qualified borrowers in the communities where the bank conducts business. These programs had a neutral impact on the bank's lending performance.

## Conclusions for Areas Receiving Limited-Scope Reviews

Based on limited-scope reviews, the bank's overall performance in the Allentown MSA, Altoona MSA, East Stroudsburg MSA, Erie MSA, Greene County, Harrisburg MSA, Johnstown MSA, Newark MSA, Northumberland/Schuylkill/ Union Counties, Pittsburgh, Reading MSA, Scranton MSA, Venango/Warren Counties, Wayne County, and York MSA AAs is not inconsistent with the bank's performance in the full-scope AA.

The bank performance in the Chambersburg MSA, Lancaster MSA, Lebanon MSA, and State College MSA AAs is weaker than the bank's performance in the full-scope AA. The weaker performance in these AAs is attributed to poorer lending levels and distribution of loans to low- and moderate-income tracts and individuals. However, the performance in these AAs was not significant enough to impact the overall Lending Test rating for the state as these areas represent 8.55 percent of the state's deposits.

Refer to Tables 1 through 13 in the state of Pennsylvania section of Appendix D for the facts and data that support these conclusions.

## INVESTMENT TEST

The bank's performance under the Investment Test for Pennsylvania is rated Outstanding. Based upon a full-scope review, the bank's performance in the Montgomery County AA is excellent.

## Conclusions for Areas Receiving Full-Scope Reviews

Refer to Table 14 in Appendix D for the facts and data used to evaluate the bank's level of qualified investments.

The level of CD investments is excellent based on the volume of investments made and the available opportunities in the AA. The bank has ample opportunity to make qualified CD investments in the AA and during the evaluation period, WNB made 13 investments totaling \$1.7 million in this AA. The bank's total investment amount represented 637 percent of allocated Tier One Capital for the full-scope AA. These investments consist of:

- Five MBSs for \$954,000 secured by mortgages to low- or moderate-income individuals in the AA.
- Six CDs totaling \$725,000 with two local minority-owned banks in the AA to help meet the credit needs of the community.
- Two grants/donations for \$6,000 to two organizations in the AA that provided community development services to low- to moderate-income individuals.

These investments were highly responsive to meeting the affordable housing and community development identified needs in the AA and WNB was very active in helping to meet these needs.

In addition, \$250,000 of long-term equity investments remain outstanding from the previous exam. The bank's investment in the investment fund continues to have a positive impact on the AA and supported affordable housing in the area.

## **Conclusions for Areas Receiving Limited-Scope Reviews**

Based on limited-scope reviews, the bank's performance under the Investment Test in the Pittsburgh AA and Reading AA is not inconsistent with the bank's performance in the full-scope AA.

Performance in the Allentown-Easton AA, Altoona AA, Chambersburg-Waynesboro AA, East Stroudsburg AA, Erie AA, Harrisburg-Carlisle AA, Johnstown AA, Lancaster AA, Lebanon AA, Newark AA, Northumberland-Schuylkill-Union Counties AA, State College AA, Venango and York-Hanover AA is weaker than the bank's performance in the full-scope AA. The investment volume in these AAs were adequate but weaker than the amounts in the full-scope area. Performance in the limited-scope AA did not impact the bank's overall Investment Test rating.

However, the bank's investment performance in the Greene County AA, Scranton-Wilkes-Barre-Hazleton AA and Venango and Warren Counties AA was significantly less than the full-scope area.

## **SERVICE TEST**

The bank's performance under the Service Test in Pennsylvania is rated Needs to Improve. Based on a full-scope review, the bank's performance in the Montgomery AA is adequate. However, weaker performance in the limited-scope AAs had a negative impact on the bank's overall performance in the state.

## **Conclusions for Areas Receiving Full-Scope Reviews**

### **Retail Banking Services**

Refer to Table 15 in the Pennsylvania AA section of Appendix D for the facts and data used to evaluate the distribution of the bank's branch delivery system and branch openings and closings.

The bank's delivery systems are accessible to geographies and individuals of different income levels in the AA.

WNB operates four banking offices in the Montgomery AA, all of which are located in Wal-Mart stores. Of these, 25.00 percent (1) is located in a low-income CT and therefore the bank's branch distribution in these tracts exceeds the percentage of the population in the AA. About 2.41 percent of the population reside in low-income tracts. In addition, 25.00 percent (1) of the locations are located in a moderate-income CTs and therefore the bank's percentage of branches also exceeds the percentage of the population in the area. About 19.73 percent of the population in moderate-income tracts. The majority of the population, approximately 77.50 percent, resides in middle- and upper-income CTs.

In addition, the bank's branches are located near 24 moderate-income tracts, which provides some accessibility to the bank's delivery systems to individuals in these tracts. There are 106 moderate-income tracts in this AA.

No branches were closed in this AA during the evaluation period. Therefore, low- or moderate-income individuals and geographies were not adversely affected by accessibility of delivery systems.

## **Community Development Services**

In the Montgomery County AA, WNB's record of providing CD services is adequate based on the available opportunities in the AA. We identified an ample number of non-profit organizations that operate in this AA. During this evaluation period, WNB primarily provided financial literacy training using the FDIC's Money Smart program and held classes totaling 161 hours for low- and moderate-income individuals in the area.

In addition, four bank employees provide financial services to four non-profit organizations. Examples of specific services provided include the following:

- One employee served on the family selection committee for an organization that build and renovate homes that primarily benefit LMI families.
- Serve on the board of a non-profit that provides financial education assistance to families in poverty and at risk of homelessness.

## **Conclusions for Areas Receiving Limited-Scope Reviews**

Based on limited scope reviews, the performance in the Allentown-Bethlehem-Easton MSA, Altoona MSA, Chambersburg-Waynesboro MSA, East Stroudsburg MSA, Erie MSA, Greene County, Harrisburg-Carlisle MSA, Johnstown MSA, Lancaster MSA, Lebanon MSA, Newark MD, Northumberland-Schuylkill-Union Counties, Pittsburgh MSA, Reading MSA, Scranton-Wilkes-Barre-Hazleton MSA, State College MSA, Venango and Warren Counties, Wayne County and the York-Hanover MSA is weaker than the bank's overall performance in the full-scope AA. The weaker performance is attributable to a weaker branch distribution in the low- and moderate-income tracts. These AAs represent 95.33 percent of the state's deposits. The performance in these limited-scope AAs had a negative impact on the overall performance in the state.

Furthermore, the bank has 34 banking offices in the state. The bank has no offices in low-income tracts and only two offices in moderate-income tracts (5.88 percent). This reflects poor distribution of banking offices.



## State of South Carolina

**CRA Rating for South Carolina: Satisfactory**

**The Lending Test is rated: Low Satisfactory**

**The Investment Test is rated: Outstanding**

**The Service Test is rated: Low Satisfactory**

The major factors that support this rating include:

- The overall level of lending is adequate. The geographic distribution of loans is adequate. The distribution of loans by borrower income level is good.
- The level of CD loans is adequate.
- The level of CD investments is excellent.
- Retail banking services are reasonably accessible to geographies and individuals of different income levels in the AA. The level of CD services is adequate.

### Description of Institution's Operations in South Carolina

WNB has 27 branches in the State of South Carolina. The State of South Carolina represents 4 percent of the bank's branching network and 0.79 percent of their deposit base. Based on 2014 FDIC data, the bank has deposits of \$29 million in the state. WNB has a small presence in the state and is ranked number 84 out of 91 institutions with a deposit market share of 0.04 percent.

WNB has 11 AAs in the state including the Augusta-Richmond County MSA, Charleston-North Charleston MSA, Cherokee County, Colleton County, Columbia MSA (Columbia AA), Greenville-Anderson-Mauldin MSA, Greenwood County, Hilton Head Island-Bluffton-Beaufort MSA, Northern Non-MSA, Oconee County, and the Spartanburg MSA.

Refer to the market profiles for the State of South Carolina AA in Appendix C for detailed demographics and other performance context information for AAs that received full-scope reviews.

### Scope of Evaluation in South Carolina

We selected one AA in the state to perform a full-scope review, the Columbia AA. When comparing this AA to the bank's presence in the state, the Columbia AA represents 19 percent of South Carolina's branching network and 21 percent of its total deposit base. Performance in this area was given more emphasis than performance in limited-scope AAs.

Limited-scope reviews were performed for Augusta-Richmond County MSA, Charleston-North Charleston MSA, Cherokee County, Colleton County, Greenville-Anderson-Mauldin MSA, Greenwood County, Hilton Head Island-Bluffton-Beaufort MSA, Northern Non-MSA, Oconee County, and the Spartanburg MSA.

Refer to the tables in Appendix D for more information on lending activity for the State of South Carolina.

## **LENDING TEST**

The bank's performance under the Lending Test in the state of South Carolina is rated Low Satisfactory. Based on a full-scope review, the bank's performance in the Columbia AA is adequate.

### **Conclusions for Areas Receiving Full-Scope Reviews**

#### **Lending Activity**

The bank's overall volume of loans in the Columbia AA is adequate. Lending levels are adequate considering the bank's size, capacity and presence in the market.

Refer to Tables 1 Lending Volume in the state of South Carolina AA section of Appendix D for the facts and data used to evaluate the bank's lending activity.

During this evaluation period, WNB made 82 home mortgage refinance loans, 25 loans to small businesses, and 241 consumer loans. The bank made no small farm or multifamily loans in this AA. The bank did make four home purchase loans (one loan to a moderate-income borrower) and four home improvement loans. Two of the home improvement loans were made in moderate tracts and two loans were made to moderate-income borrowers.

More emphasis was placed on consumer loans rather than refinance loans as consumer loans represent 69.25 percent of all loans originated in this AA. The bank's refinance loans were given more emphasis than the small loans to businesses. WNB is not a predominant home mortgage lender in this AA. In 2013, WNB ranked 69 out of 302 lenders in overall market share for refinance loans in the Columbia AA. WNB had nominal total market share of 0.15 percent.

Based on FDIC market share information as of June 30, 2014, WNB ranked 26 out of 27 institutions with a nominal deposit market share of 0.03 percent. Considering the bank's market share of refinance loans compared to their deposit market share, the bank's level lending is adequate.

#### **Distribution of Loans by Income Level of the Geography**

Overall, WNB's geographic distribution of loans is adequate. The geographic distribution of refinance loans is adequate. The geographic distribution of small loans to businesses is poor. As previously stated, more emphasis was given to the bank's consumer lending. The geographic distribution of consumer loans is excellent.

### ***Home Refinance Loans***

Refer to Tables 4 in the state of South Carolina section of Appendix D for the facts and data used to evaluate the geographic distribution of the bank's home mortgage loan refinance originations.

The geographic distribution of refinance loans is adequate. The population of loans reviewed was relatively small, 45 for 2012/2013 and 37 for 2014/2015. Therefore, there was not a significant difference in the number of loans in each tract category.

For 2012/2013, the bank's geographic distribution of loans is poor. During this evaluation period, WNB made no loans in low-income tracts. This reflects very poor performance. However, only 0.99 percent of the owner-occupied units in the AA are located in these geographies which somewhat mitigates the bank's poor performance. The bank's distribution of loans in moderate-income geographies is poor as their percentage of loans is somewhat below the percentage of owner-occupied units in these geographies. Based on 2013 market share data, the bank made no loans in low-income tracts, however, their distribution in moderate-income tracts exceeds their overall market share of loans in all tracts.

For 2014/2015, the bank's geographic distribution of loans is excellent. Their distribution of loans in both low- and moderate-income geographies exceeds the percentage of owner-occupied units in these geographies. In addition, the bank's market share performance is also excellent. Their market share in both low- and moderate-income tracts exceeds their overall market share of loans in all tracts.

### ***Small Loans to Businesses***

Refer to Tables 6 in the state of South Carolina section of Appendix D for the facts and data used to evaluate the geographic distribution of the bank's small loans to businesses.

The geographic distribution of small loans to businesses is poor.

For 2012/2013, the bank made one small loan to a business in this AA, which reflects very poor performance. The loan was not made in either a low- or moderate-income tract.

For 2014/2015, the bank's geographic distribution of loans is adequate. However, this assessment is based on a small population of 24 loans and there was not a significant difference in the number of loans in each tract category. WNB made no small loans to businesses in low-income geographies. This reflects very poor performance. However, their distribution of small loans to businesses in moderate-income geographies exceeds the percentage of businesses in these geographies. In terms of market share performance, the bank's 2014 performance is also adequate. The bank made no loans in low-income tracts in 2014. However, their market share in moderate-income tracts exceeds their overall market share.

### ***Consumer Loans***

Refer to Tables 13 in the state of South Carolina section of Appendix D for the facts and data used to evaluate the geographic distribution of the bank's consumer loan originations.

The geographic distribution of consumer loans is excellent.

For 2012/2013, the bank's geographic distribution of consumer loans is excellent. The distribution of loans in both low- and moderate-income tracts exceeds the percentage of households in these tracts. Market share data is not available for consumer loans.

For 2014/2015, the bank's geographic distribution of consumer loans is excellent. The distribution of loans in both low- and moderate-income tracts exceeds the percentage of households in these tracts. Market share data is not available for consumer loans.

### ***Lending Gap Analysis***

We analyzed WNB's lending distribution within the Columbia AA to determine if any unexplained, conspicuous gaps existed in the bank's home mortgage, small business, and consumer loan activity. We used lending distribution reports to identify geographies where the bank did not make any loans.

We also reviewed the demographics of geographies where no loans were made. We considered loan distributions, branch locations, and demographic information. As a result of this analysis, no unexplained conspicuous gaps were found in either the home mortgage, small business, or consumer loan lending activity.

### ***Inside/Outside Ratio***

A substantial majority of the bank's loans were made inside their AAs. Overall, 96.9 percent of the bank's loans in the state of South Carolina were made inside their AAs. By loan product, 100 percent of HMDA loans, 95.6 percent of small business loans, and 95.9 percent of consumer loans were made inside WNB's AAs. This assessment was based on lending within this state rather than the entire bank. The percentage of lending in this AA was a neutral factor in the overall analysis of the Lending Test.

### **Distribution of Loans by Income Level of the Borrower**

Overall, WNB's distribution of loans by income level of the borrower is good. The borrower distribution of home refinance loans is good. The borrower distribution of loans to small businesses is adequate. As previously stated, more emphasis was given to the bank's consumer lending. The borrower distribution of consumer loans is excellent.

### ***Home Refinance Loans***

Refer to Tables 10 in the state of South Carolina section of Appendix D for the facts and data used to evaluate the borrower distribution of the bank's home mortgage refinance loan originations.

The borrower distribution of refinance loans is good. However, the population of loans reviewed was relatively small, 45 for 2012/2013 and 37 for 2014/2015. Therefore, the actual number of loans made in each family category did not vary significantly.

For 2012/2013, the distribution of loans is good. Their distribution of loans to low-income families is somewhat lower than the percentage of low-income families in the AA. This reflects poor performance. However, their distribution of loans to moderate-income families is excellent as it exceeds the percentage of moderate-income families. Based on 2013 market share data, WNB's market share to both low- and moderate-income families exceeds their overall market share of loans to all individuals.

For 2014/2015, the bank's borrower distribution of loans is excellent. The distribution of loans to both low- and moderate-income families exceeds the percentage of these families in the AA. Their market share performance is also excellent. The bank's market share to both low- and moderate-income borrowers exceeds their overall market share of loans to all borrowers.

### ***Small Loans to Businesses***

Refer to Tables 11 in the state of South Carolina AA section of Appendix D for the facts and data used to evaluate the borrower distribution of the bank's loans to small businesses.

The borrower distribution of small loans to businesses is adequate.

For 2012/2013, the bank made one small loan to a business in this time frame. This reflects very poor performance. This loan was not made to a small business.

For 2014/2015, the bank's borrower distribution of loans is excellent. However, this assessment is based on a small population of 24 loans. WNB's dispersion of small loans to businesses exceeds the percent of small businesses in the AA. Furthermore, the bank's market share to small businesses in 2014 significantly exceeds the overall market share of loans to all businesses. This further demonstrates that the bank is meeting the lending needs of small businesses in the AA.

### ***Consumer Loans***

Refer to Tables 13 in the state of South Carolina section of Appendix D for the facts and data used to evaluate the borrower income distribution of the bank's consumer loan originations.

The borrower distribution of consumer loans is excellent.

For 2012/2013, the bank's borrower distribution of consumer loans is excellent. The distribution of loans to both low- and moderate-income households exceeds the percentage of these households in the AA. Market share data is not available for consumer loans.

For 2014/2015, the bank's borrower distribution of consumer loans is also excellent. The distribution of loans to low-income households exceeds the percentage of low-income households. The distribution of loans to moderate-income households exceeds the percentage of moderate-income households. Market share data is not available for consumer loans.

## Community Development Lending

Refer to Tables 1 Lending Volume in the state of South Carolina section of Appendix D for the facts and data used to evaluate the bank's level of community development lending. The totals on this table include all CD loans, including multifamily loans that qualified for CD purposes during the evaluation period.

Community development lending is adequate based on the available opportunities in the AA. There is ample opportunity in this AA to make CD loans and during this evaluation period and the bank originated two CD loans in the AA totaling \$70,000 or 8 percent of allocated Tier One Capital.

The bank's CD lending activities are summarized below:

- One loan for \$25,000 to an organization that provides financial education, lending and investing in LMI areas.
- One loans for \$45,000 to an organization that provides financial training to start-up and existing businesses in the AA.

The loans were not considered complex or innovative, but help meet the identified need for loans to consumers and small business owners. CD lending had a neutral impact on the bank's lending activity in this AA.

### Product Innovation and Flexibility

WNB has established a lending partnership with a nationwide mortgage lender in manner that ensures that a full array of mortgage financing products are available to serve the full market of qualified borrowers in the communities where the bank conducts business. These programs had a neutral impact on the bank's lending performance.

## Conclusions for Areas Receiving Limited-Scope Reviews

Based on limited-scope reviews, the bank's overall performance in the Charleston MSA, Greenville MSA, and Hilton Head Island MSA AAs is adequate and not inconsistent with the bank's performance in the full-scope AA.

The bank performance in the Augusta-Richmond County MSA, Cherokee County, Colleton County, Greenwood County, Northern Non-MSA, Oconee County AA and Spartanburg MSA is weaker than the bank's performance in the full-scope AA. Weaker poor is attributed to poorer distribution of loans or poor lending levels.

Refer to Tables 1 through 13 in the state of South Carolina section of Appendix D for the facts and data that support these conclusions.

## INVESTMENT TEST

The bank's performance under the Investment Test for South Carolina is rated Outstanding. Based upon a full-scope review, the bank's performance in the Columbia AA is excellent and had a significant impact on the AA.

### Conclusions for Areas Receiving Full-Scope Reviews

Refer to Table 14 in Appendix D for the facts and data used to evaluate the bank's level of qualified investments.

The level of CD investments is excellent. The bank has ample opportunity to make qualified CD investments in the Columbia AA and during the evaluation period, WNB made 12 investments in the Columbia AA totaling \$933,000. The bank's total investment amount represented 100 percent of allocated Tier One Capital for the full-scope AA. Qualified investments for the current period include grants, donations, certificate of deposits and MBS and are summarized below:

- Seven MBSs for \$763,000 where the underlying mortgages were made to low- and moderate-income individuals in the AA.
- Three CDs totaling \$151,000 with a local minority-owned bank to help meet the credit needs of the Columbia AA.
- Two grants or donations for \$19,000 to organizations in the AA that provided community development services to low- to moderate-income individuals.

These investments were not innovative or flexible but did demonstrate excellent responsiveness to meeting the affordable housing and community development needs in the AA. Affordable housing and economic development were identified as needs in all AAs. In addition, WNB has two prior period, long-term equity investments, totaling \$25,000. These affordable housing prior period investments continue to have a positive impact on the AA.

### Conclusions for Areas Receiving Limited-Scope Reviews

Based on limited-scope reviews, the bank's performance under the Investment Test in the Augusta-Richmond AA, Charleston-North Charleston AA, Colleton AA, Greenville-Anderson-Mauldin AA, Greenwood County AA, Northern Non-MSA AA and Spartanburg AA is not inconsistent with the bank's performance in the full-scope AA.

Performance in the Cherokee County AA, Hilton Head Island-Bluffton-Beaufort AA, and Oconee County AA is adequate but weaker than the bank's performance in the full-scope AA as the investments amounts were smaller. Weaker performance in the limited-scope AAs were not significant enough to impact the overall state rating.

Refer to Table 14 in Appendix D for the facts and data used to evaluate the bank's level of qualified investments.

## **SERVICE TEST**

The bank's performance under the Service Test in South Carolina is rated Low Satisfactory. Based on a full-scope review, the bank's performance in the South Carolina AA is adequate.

### **Conclusions for Areas Receiving Full-Scope Reviews**

#### **Retail Banking Services**

Refer to Table 15 in the South Carolina AA section of Appendix D for the facts and data used to evaluate the distribution of the bank's branch delivery system and branch openings and closings.

The bank's delivery systems are reasonably accessible to geographies and individuals of different income levels in the AA.

WNB operates five banking offices in the Columbia MSA AA, all of which are located in Wal-Mart stores. Of these, none are located in low-income CTs and therefore the bank's branch distribution in these tracts is significantly lower than the percentage of the population in the AA, which is 3.58 percent. With 20.00 percent (1) of the locations in moderate-income CTs, the bank's percentage of branches is lower than the population in the area, which is 27.81 percent.

Access to the bank's delivery systems improved when the branches near low-or moderate-income tracts are considered. Four of the banking offices are within a five mile radius of all 10 low-income tracts and at least 23 of the 58 moderate-income tracts.

The bank's record of opening and closing branches has not adversely affected the accessibility of delivery systems, particularly in low- or moderate-income geographies or to low- or moderate-income families in the area. During this evaluation period, there were no banking offices opened or closed in the AA.

#### **Community Development Services**

In the Columbia MSA, WNB's record of providing CD services is adequate based on the bank's size and available resources. We identified several non-profit organizations and three CDFIs that operate in this AA. During this evaluation period, WNB primarily provided financial literacy training using the FDIC's Money Smart program and held classes totaling 249 hours for low- and moderate-income individuals in the area.

In addition, five bank officers serve on the board, advisory committee or financial committee for four CD organizations that provide affordable housing and community services. Specific examples of the type of financial services provided include:

- Serve on the advisory committee or family selection committee for an organization in the AA that helps build and renovate homes that primarily benefit LMI families. Services provided include evaluating the credit worthiness of applicants to determine whether the applicant qualifies for the program.



- Serve as a financial committee advisor for an organization that provides housing assistance and financial stabilization services to the homeless.

## **Conclusions for Areas Receiving Limited-Scope Reviews**

Based on limited-scope reviews, the performance in the Augusta-Richmond County MSA, Charleston-North Charleston MSA, Cherokee County, Colleton County, Greenwood County, Northern Non-MSA, and Oconee County is weaker than the bank's performance in the full-scope AA. In these AAs, the bank has no branches in either low- and moderate-income tracts. These AAs represent 36.09 percent of the state's total deposits.

The bank's performance in the Greenville-Anderson-Mauldin MSA, Hilton Head Island-Bluffton-Beaufort MSA, and Spartanburg MSA is not inconsistent with the bank's performance in the full-scope AA. Overall, performance in the limited-scope AAs did not impact the bank's overall performance in the state.

## State of Virginia

**CRA Rating for Virginia: Satisfactory**

**The Lending Test is rated: High Satisfactory**

**The Investment Test is rated: Low Satisfactory**

**The Service Test is rated: High Satisfactory**

The major factors that support this rating include:

- The overall level of lending is adequate. The geographic distribution of loans is adequate. The distribution of loans by borrower income level is adequate.
- The level of CD loans is excellent and increased the Lending Test rating.
- The level of CD investments is adequate.
- The bank's delivery systems are unreasonable inaccessible to portions of its AA, particularly low- or moderate-income geographies and individuals in the full-scope AA. An excellent level of CD services in the full-scope AA increased the Service Test conclusion. Furthermore, stronger branch distribution in the limited-scope AAs also helped to increase the Service Test rating for the state.

### Description of Institution's Operations in Virginia

WNB has 48 branches in the State of Virginia. The State of Virginia represents 6 percent of the bank's branching network and 1.37 percent of their deposit base. Based on 2014 FDIC data, the bank has deposits of \$51 million in the state. WNB has a small presence in the state and is ranked number 116 out of 139 institutions with a deposit market share of 0.02 percent.

WNB has 15 AAs in the state including the Accomack County, Blacksburg-Christiansburg-Radford MSA, Central Non-MSA, Harrisonburg MSA, Lee and Wise Counties and Norton City, Kingsport-Bristol MSA, Louisa County, Lynchburg MSA, Northumberland and Lancaster Counties, Prince Edward County, Richmond MSA (Richmond AA), Roanoke MSA, Southwest MSA, Staunton-Waynesboro MSA, and the Virginia Beach-Norfolk-Newport News MSA.

Refer to the market profiles for the State of Virginia in Appendix C for detailed demographics and other performance context information for AAs that received full-scope reviews.

### Scope of Evaluation in Virginia

We selected one AA in the state to perform a full-scope review, the Richmond AA. When comparing this AA to the bank's presence in the state, the Richmond AA represents 17 percent of Virginia's branching network and 16 percent of its total deposit base. Performance in this area was given more emphasis than performance in limited-scope AAs.

Limited-scope reviews were performed for Accomack County, Blacksburg-Christiansburg-Radford MSA, Central Non-MSA, Harrisonburg MSA, Lee and Wise Counties and Norton City, Kingsport-Bristol MSA, Louisa County, Lynchburg MSA, Northumberland and Lancaster Counties, Prince Edward County, Roanoke MSA, Southwest MSA, Staunton-Waynesboro MSA, and the Virginia Beach-Norfolk-Newport News MSA.

Refer to the tables in Appendix D for more information on lending activity for the State of Virginia.

## **LENDING TEST**

The bank's performance under the Lending Test in the state of Virginia is rated High Satisfactory. Based on a full-scope review, the bank's performance in the Richmond MSA AA is adequate. However, an excellent level of CD lending increased the Lending Test rating.

## **Conclusions for Areas Receiving Full-Scope Reviews**

### **Lending Activity**

Refer to Tables 1 Lending Volume in the state of Virginia section of Appendix D for the facts and data used to evaluate the bank's lending activity.

The bank's overall volume of loans in the Richmond AA is adequate. Lending levels are adequate considering the bank's capacity, presence in the market and the competition in the AA. The bank has a modest presence in this AA with a small deposit base and competition in the AA is strong.

During this evaluation period, WNB made 69 home mortgage refinance loans, 21 loans to small businesses, and 267 consumer loans. The bank made no small farm or multifamily loans. However, they made one home purchase loan and two home improvement loans. One of the home improvement loans was made to a low-income borrower and the other made to a moderate-income borrower.

More emphasis was placed on consumer loans rather than the home mortgage refinance loans as consumer loans represent 74.79 percent of all loans originated in this AA. The bank's home refinance loans were given more emphasis than the small loans to businesses. WNB is not a predominant home mortgage lender in this AA. In 2013, WNB was ranked 87 out of 381 lenders in overall market share for total home mortgage refinance loans in the Richmond VA MSA AA. WNB had nominal total market share of 0.12 percent. Based on 2013 market share data, WNB made no small loans to businesses in this AA, therefore, the bank's market share is zero.

With respect to deposit market share, June 30, 2014 FDIC data showed that WNB ranked last out of 26 institutions in this AA with a nominal market share of 0.01 percent. When we compared the bank's refinance market share to their deposit market, their lending activity is adequate.

## **Distribution of Loans by Income Level of the Geography**

Overall, WNB's geographic distribution of loans is good. The geographic distribution of both refinance and small loans to businesses is adequate. Their geographic distribution of consumer loans is excellent. In arriving at the overall conclusion, consumer loans carried more emphasis than the other loan products.

### ***Home Refinance Loans***

Refer to Tables 4 in the state of Virginia section of Appendix D for the facts and data used to evaluate the geographic distribution of the bank's home mortgage loan refinance originations.

The geographic distribution of refinance loans is adequate.

For 2012/2013, the bank's geographic distribution of loans is poor. During this evaluation period, WNB made no loans in low-income geographies, which reflects very poor performance. Their distribution of loans in moderate-income geographies is adequate and is lower than the percentage of owner-occupied units in these geographies. WNB's market share performance is adequate. For 2013, market share data shows that WNB made no loans in low-income tracts; however, their market share in moderate-income tracts equals their overall market share of loans in all tracts.

For 2014/2015, the bank's geographic distribution of loans is excellent. However, this assessment is based on a small population of 22 loans. Therefore, the number of loans in each tract did not differ significantly. Based on this population, the distribution of loans in both low- and moderate-income geographies exceeds the percentage of owner-occupied units in these geographies. Based on 2014 market share data, the bank's market share in both low- and moderate-income tracts exceeds their overall market share of loans in all tracts and reflects excellent performance.

### ***Small Loans to Businesses***

Refer to Tables 6 in the state of Virginia section of Appendix D for the facts and data used to evaluate the geographic distribution of the bank's small loans to businesses.

The geographic distribution of loans to small businesses is adequate. This conclusion is a blend of the bank's performance in both analysis periods.

For 2012/2013, the bank made no small loans to businesses during this time frame and this had a negative impact on the performance conclusion for this area.

For 2014/2015, the bank made 21 small loans to businesses. Since the population of loans is small, the number of loans in the tract categories did not vary significantly. Based on this population of loans, the bank's geographic distribution of loans is excellent. The distribution of small loans to businesses in low-income CTs is near the percentage of businesses in these tracts. The distribution of small loans to businesses in moderate-income CTs significantly exceeds the percentage of businesses in these tracts. In addition, the bank's market share performance is also excellent. Their market share in both low- and moderate-income tracts exceeds their overall market share of loans in all tracts.

## ***Consumer Loans***

Refer to Tables 13 in the state of Virginia section of Appendix D for the facts and data used to evaluate the geographic distribution of the bank's consumer loan originations.

The geographic distribution of consumer loans is excellent.

For 2012/2013, the bank's geographic distribution of consumer loans is excellent. The distribution of loans in both low- and moderate-income CTs exceeds the percentage of households in these tracts. Market share data is not available for consumer loans.

For 2014/2015, the bank's geographic distribution of consumer loans is excellent. The distribution of loans in both low- and moderate-income CTs exceeds the percentage of households in these tracts. Market share data is not available for consumer loans.

## ***Lending Gap Analysis***

We analyzed WNB's lending distribution within the Richmond MSA AA to determine if any unexplained, conspicuous gaps existed in the bank's home mortgage, small business, and consumer loan activity. We used lending distribution reports to identify geographies where the bank did not make any loans. We also reviewed the demographics of geographies where no loans were made. We considered loan distributions, branch locations, and demographic information. As a result of this analysis, no unexplained conspicuous gaps were found in either the home mortgage, small business, or consumer loan lending activity.

## ***Inside/Outside Ratio***

A substantial majority of the bank's loans were made inside their AAs. Overall, 93.4 percent of the bank's loans in the state of Virginia were made inside their AAs. By loan product, 99.3 percent of HMDA loans, 86.5 percent of small business loans, and 92.3 percent of consumer loans were made inside WNB's AAs. This assessment was based on lending within this state rather than the entire bank. The percentage of lending in this AA was a neutral factor in the overall analysis of the Lending Test.

## **Distribution of Loans by Income Level of the Borrower**

Overall, WNB's distribution of loans by income level of the borrower is good. The borrower distribution of home refinance loans is good. The borrower distribution of small loans to businesses is adequate. As previously stated, more emphasis was given to the bank's consumer lending. The borrower distribution of consumer loans is excellent.

## ***Home Refinance Loans***

Refer to Tables 10 in the state of Virginia section of Appendix D for the facts and data used to evaluate the borrower distribution of the bank's home mortgage refinance loan originations.

The borrower distribution of refinance loans is good.

For 2012/2013, the bank's borrower distribution of loans is adequate. The distribution of loans to low-income families is significantly lower than the percentage of low-income families in the AA and this reflects very poor performance. However, their distribution of loans to moderate-income families exceeds the percentage of moderate-income families. Their 2013 market share is adequate. Their market share of refinance loans to low-income borrowers is somewhat lower than their overall market share of loans to all borrowers. However, their market share to moderate-income borrowers exceeds their overall market share.

As stated previously, a small population of 22 refinance loans were reviewed and the number of loans made to each family category did not vary significantly. Based on this population, the bank's borrower distribution of loans is excellent. For 2014/2014, their distribution of loans to low-income borrowers is good as the bank's distribution of loans is near the percentage of low-income families in the AA. Their distribution of loans to moderate-income borrowers significantly exceeds the percentage of moderate-income families in the AA. The bank's 2014 market share performance is also excellent. Their market share to both low- and moderate-income borrowers exceeds their overall market share of loans to all borrowers.

### ***Small Loans to Businesses***

Refer to Tables 11 in the state of Virginia section of Appendix D for the facts and data used to evaluate the borrower distribution of the bank's small loans to businesses.

The borrower distribution of small loans to businesses is adequate. This performance conclusion is a blend of the bank's performance during both analysis periods.

For 2012/2013, the bank made no small loans to businesses. This had a negative impact on the performance conclusion for this area.

For 2014/2015, the bank's borrower distribution of loans is good. However, this assessment is based on a small population of 21 loans. WNB's dispersion of small loans to businesses exceeds the percent of small businesses in the AA. In addition, the bank's market share of loans to small businesses exceeds their overall market share of loans to all businesses and further demonstrates their willingness to meet the lending needs of small businesses in the AA.

### ***Consumer Loans***

Refer to Tables 13 in the state of Virginia section of Appendix D for the facts and data used to evaluate the borrower income distribution of the bank's consumer loan originations.

The borrower distribution of consumer loans is excellent.

For 2012/2013, the bank's borrower distribution of consumer loans is excellent. The distribution of loans to both low- and moderate-income households exceeds the percentage of low- and moderate-income households in the AA. Market share data is not available for consumer loans.

For 2014/2015, the bank's borrower distribution of consumer loans is also excellent. The distribution of loans to both low- and moderate-income households exceeds the percentage of these households in the AA. Market share data is not available for consumer loans.

## Community Development Lending

Refer to Tables 1 Lending Volume in the state of Virginia section of Appendix D for the facts and data used to evaluate the bank's level of community development lending. The totals on this table includes all CD loans, including multifamily loans that qualified for CD purposes during the evaluation period.

The level of community development lending is excellent and had a significant positive impact on lending performance in the Richmond AA. The bank originated five CD loans in the AA totaling \$630,000 or 59 percent of allocated Tier One Capital. These loans provided financing to help residents and community-based organizations rebuild low- and moderate-income neighborhoods by providing financial wellness and empower low wealth families and communities. Affordable housing is an identified need in all AAs.

Specific information regarding these loans follows:

- One loan for \$75,000 to an organization that provides vehicle loans to LMI borrowers as a means of transportation to work.
- One loan for \$50,000 to a CDFI that provides loan and investment solutions for affordable housing and economic development projects.
- Three loans for \$505,000 that provide affordable housing and supportive services to LMI individuals.

The loans were not considered complex or innovative but were highly responsive to meeting the affordable housing and revitalization needs of the AA.

### Product Innovation and Flexibility

WNB has established a lending partnership with a nationwide mortgage lender in manner that ensures that a full array of mortgage financing products are available to serve the full market of qualified borrowers in the communities where the bank conducts business. These programs had a neutral impact on the bank's lending performance.

### Conclusions for Areas Receiving Limited-Scope Reviews

Based on limited-scope reviews, the bank's overall performance in the Louisa County and Virginia Beach MSA AAs is not inconsistent with the bank's performance in the full-scope AA. These AAs represent 32.77 percent of the bank's deposits in the state.

The bank performance in the Accomack County, Blacksburg MSA, Central Non- MSA, Harrisonburg MSA, Kingsport MSA, Lee/Wise Counties, Lynchburg MSA, Norton City, Northumberland/Lancaster/Middlesex Counties, Roanoke MSA, Prince Edward/Cumberland Counties AAs, Southwest VA Non-MSA, and Stanton MSA is weaker than the bank's performance in the full-scope AA.

The weaker performance in these AAs is primarily due to poorer lending levels and/or distribution of loans to low- and moderate-income tracts or individuals. These AAs represent 49.98 percent of the bank's deposits in the state. The bank's performance in these AA was not significant enough to impact the overall Lending Test rating for the state.

Refer to Tables 1 through 13 in the state of Virginia section of Appendix D for the facts and data that support these conclusions.

## **INVESTMENT TEST**

The bank's performance under the Investment Test for Virginia is rated Low Satisfactory. Based upon a full-scope review, the bank's performance in the Richmond AA is adequate.

### **Conclusions for Areas Receiving Full-Scope Reviews**

Refer to Table 14 in Appendix D for the facts and data used to evaluate the bank's level of qualified investments. .

The level of CD investments is adequate based on the ample opportunities in the AA and the bank's dollar volume of investments made in the AA. During the evaluation period, WNB made six investments in the Richmond AA totaling \$190,000. The bank's total investment amount represented 18 percent of allocated Tier One Capital for the full-scope AA.

Current period investments are comprised of grants, donations, and MBS. Specific information regarding these investments follows:

- One MBS for \$143,000 secured by mortgages made low to LMI borrowers in the AA.
- Five grants/donations for \$48,000 to organizations that provide community services or affordable housing to LMI individuals.

Additionally, five prior period, long-term equity investments, totaling \$1.3 million. These affordable housing investments continue to have a positive impact on the AA.

### **Conclusions for Areas Receiving Limited-Scope Reviews**

Based on limited-scope reviews, the bank's performance under the Investment Test in the Harrisonburg AA, Lynchburg AA, Southwest Non-MSA AA, Staunton-Waynesboro AA, and Virginia Beach-Norfolk-Newport News AA is greater than the bank's performance in the full-scope AA.

Performance in the Accomack County AA, Blacksburg-Christiansburg-Radford AA, Lee and Wise Counties AA, Louisa County AA, Prince Edward and Cumberland Counties AA, and Roanoke AA is not inconsistent with the bank's performance in the full-scope AA.

Performance in the Central Non-MSA AA, Kingsport-Bristol AA and Northumberland-Lancaster-Middlesex AA is weaker than the bank's performance in the full-scope AA.



Weaker investment performance in these AAs are attributed to lesser amount and quality of investments. These AAs represent 4.96 percent of the state's deposits.

Refer to Table 14 in Appendix D for the facts and data used to evaluate the bank's level of qualified investments.

## **SERVICE TEST**

The bank's performance under the Service Test in Virginia is rated Low Satisfactory. Based on a full-scope review, the bank's performance in the Richmond MSA AA is poor. Excellent CD services in the full-scope AA rating increased the Service test rating. Also, stronger branch distribution in the limited-scope AAs also contributed to the increased Service test rating for the state.

## **Conclusions for Areas Receiving Full-Scope Reviews**

### **Retail Banking Services**

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

The bank's delivery systems are unreasonable inaccessible to portions of the AA, particularly low- and moderate-income geographies and individuals.

WNB operates eight banking offices in the Richmond AA, all of which are located in Wal-Mart stores. Of these, none are located in low-income or moderate-income CTs. Therefore, the percentage of branches in low- and moderate-income tracts is significantly lower than the percentage of the population that resides in these tracts. About 7.96 percent of the population resides in the low-income tracts and 19.76 percent of the population resides in the moderate-income tracts.

Access to the bank's delivery systems is somewhat improved when we considered those banking offices that are near low- or moderate-income tracts. The bank has three branches within a five mile radius of 13 of 22 low-income tracts and all eight offices within five miles of most moderate-income tracts.

During the evaluation period, there were no banking offices opened or closed in the full-scope AA. Therefore, LMI individuals and geographies in this AA were not adversely affected by any branch opening or closings.

### **Community Development Services**

In the Richmond AA, WNB's record of providing CD services is excellent based on the available opportunities in the AA. We identified a large number of non-profit organizations and four CDFIs that operate in this AA.

During this evaluation period, WNB provided financial literacy training using the FDIC's Money Smart program and held classes totaling 682 hours for low- and moderate-income individuals in the area. Based on the size and resources of WNB, this is a significant amount of training provided.

In addition, bank officers served as board or committee members for various nonprofits. Six bank employees provided financial services to seven CD organizations in the AA. Some specific examples of the type of services provided include:

- Serve as a committee member or community development officer for an organization that provides transportation to LMI individuals.
- Serve on the board, loan advisory committee, affordable housing oversight committee and neighborhood reinvestment committee for an organization that acts as a financial intermediary to revitalizes LMI neighborhoods.
- Serve on the finance and development committee for an organization that creates and increases jobs, stimulates economic development, and increases the flow of capital for small businesses in the AA.

## **Conclusions for Areas Receiving Limited-Scope Reviews**

Based on limited-scope reviews, the bank's performance under the Service Test in the Accomack County, Blacksburg-Christiansburg-Radford MSA, Central Non-MSA, Harrisonburg MSA, Kingsport-Bristol MSA, Lee and Wise Counties and Norton City, Louisa County, Northumberland-Lancaster-Middlesex County, Prince Edward and Cumberland Counties, and Staunton-Waynesboro MSA is not inconsistent with the bank's performance in the full-scope AA. The bank has no banking offices in these AAs that are located in either low- or moderate-income tracts. These AAs represent 20.31 percent of the state's total deposits.

However, the performance in the Lynchburg MSA, Roanoke MSA, Southwest Non-MSA and the Virginia Beach-Norfolk-Newport News MSA is stronger than the performance in the full-scope AA. The stronger performance is attributable to a stronger branch distribution network in low- and moderate-income tracts. These AAs represent 62.44 percent of the state's total deposits. The performance in these AAs had a positive impact on the overall performance in the state.

## State of West Virginia

### **CRA Rating for West Virginia: Needs to Improve**

**The Lending Test is rated: Needs to Improve**

**The Investment Test is rated: Low Satisfactory**

**The Service Test is rated: Needs to Improve**

The major factors that support this rating include:

- The overall level of lending is poor. The geographic distribution of loans is poor. The distribution of loans by borrower income level is adequate.
- The level of CD loans is adequate.
- The level of CD investments is adequate.
- The bank's delivery systems are unreasonably inaccessible to portions of the AA, particularly low- and moderate-income geographies and individuals. The level of CD services is adequate.

### **Description of Institution's Operations in West Virginia**

WNB has nine branches in the State of West Virginia. The State of West Virginia represents 1.20 percent of the bank's branching network and 0.34 percent of their deposit base. Based on 2014 FDIC data, the bank has deposits of \$12 million in the state. WNB has a small presence in the state and is ranked last out of 78 institutions with a deposit market share of 0.04 percent.

WNB has seven AAs in the state including the Beckley MSA, Charleston MSA, Hagerstown-Martinsburg MSA, Huntington-Ashland MSA (Huntington), Logan County, Nicholas Count, and the Northern Non-MSA.

Refer to the market profiles for the State of West Virginia in Appendix C for detailed demographics and other performance context information for AAs that received full-scope reviews.

### **Scope of Evaluation in West Virginia**

We selected one AA in the state to perform a full-scope review, the Huntington AA. When comparing this AA to the bank's presence in the state, the Huntington AA represents 11 percent of the West Virginia's branching network and 10 percent of its total deposit base. Performance in this area was given more emphasis than performance in limited-scope AAs.

Limited-scope reviews were performed for Beckley MSA, Charleston MSA, Hagerstown-Martinsburg MSA, Logan County, Nicholas Count, and the Northern Non-MSA.

Refer to the tables in Appendix D for more information on lending activity for the State of West Virginia.

## **LENDING TEST**

The bank's performance under the Lending Test in the state of West Virginia is rated Needs to Improve. Based on a full-scope review, the bank's performance in the Huntington-Ashland WV MSA AA is poor.

### **Conclusions for Areas Receiving Full-Scope Reviews**

#### **Lending Activity**

The bank's overall volume of loans in the Huntington AA is poor. Lending levels are poor considering the bank's size, capacity and presence in the market.

Refer to Tables 1 Lending Volume in the state of West Virginia section of Appendix D for the facts and data used to evaluate the bank's lending activity.

During this evaluation period, WNB made 39 home mortgage refinance loans and 61 consumer loans. This level of lending is poor given the bank's size and resources. The bank did not make any small farm or multifamily loans. The bank did make one home purchase loan to a low-income borrower and three home improvement loans, one of which was to a low-income borrower. The bank also made three small loans to businesses, two of which were made in moderate-income tracts and all three loans were to small businesses.

Slightly more emphasis was placed on consumer loans rather than the home mortgage refinance loans as consumer loans represent 66.99 percent of all loans originated in this AA. WNB is not a predominant home mortgage lender in this AA. In 2013, WNB was ranked 72 out of 82 lenders in overall market share for total home mortgage refinance loans in the Huntington-Ashland WV MSA AA. WNB had nominal total market share of 0.08 percent.

With respect to deposit market share in this AA, as of June 30, 2014, WNB ranked last out of 19 institutions with a nominal market share of 0.03 percent.

#### **Distribution of Loans by Income Level of the Geography**

Overall, WNB's geographic distribution of loans is poor. The geographic distribution of refinance loans is adequate. The distribution of consumer loans is poor. Consumer loans carried slightly more emphasis in arriving at the overall conclusion.

##### ***Home Refinance Loans***

Refer to Tables 4 in the state of West Virginia section of Appendix D for the facts and data used to evaluate the geographic distribution of the bank's home mortgage loan refinance originations.

The geographic distribution of refinance loans is adequate. This performance conclusion is a blend of the bank's performance in both analysis periods.

For 2012/2013, the bank made one refinance loan. This loan was not in a low- or moderate-income tract. The overall volume of loans made reflects poor performance and had a negative impact on the performance conclusion for this area.

For 2014/2015, the bank's geographic distribution of loans is good. Their distribution of loans in low-income geographies exceeds the percentage of owner-occupied housing units in these geographies. The distribution of loans in moderate-income geographies is near the percentage of owner-occupied units in these geographies. The bank's 2014 market share performance is adequate. WNB made no loans in 2014 in low-income tracts. However, in moderate-income tracts, their market share exceeds their overall market share of loans in all tracts.

### ***Consumer Loans***

Refer to Tables 13 in the state of West Virginia section of Appendix D for the facts and data used to evaluate the geographic distribution of the bank's consumer loan originations.

The geographic distribution of consumer loans is poor.

For 2012/2013, the bank made 14 consumer loans. While the volume of loans is insufficient to perform a meaningful analysis, we reviewed the distribution of the loans made. No loans were made in a low-income tract and 5 were made in a moderate-income tract. This does demonstrate a willingness to make loans but the overall volume of lending reflects poor performance and had a negative impact on the performance conclusion for this area.

For 2014/2015, the bank's geographic distribution of consumer loans is poor. The distribution of loans in low-income geographies is significantly below the percentage of households in these geographies. The distribution of loans in moderate-income geographies is somewhat below the percentage of households in these geographies.

### ***Lending Gap Analysis***

A lending gap analysis was not performed for this AA, as the lending volume in the Huntington-Ashland AA was insufficient to perform a meaningful analysis.

### ***Inside/Outside Ratio***

A majority of the bank's loans were made inside their AAs. Overall, 86.6 percent of the bank's loans in the state of West Virginia were made inside their AAs. By loan product, 97.1 percent of HMDA loans and 81.9 percent of consumer loans were made inside WNB's AAs. This assessment was based on lending within this state rather than the entire bank. The percentage of lending in this AA was a neutral factor in the overall analysis of the Lending Test.

### **Distribution of Loans by Income Level of the Borrower**

Overall, WNB's distribution of loans by income level of the borrower is adequate. The borrower distribution of home refinance loans is poor.

The borrower distribution of consumer loans is adequate. Consumer loans carried slightly more emphasis in arriving at the overall performance conclusion for this area.

### ***Home Refinance Loans***

Refer to Tables 10 in the state of West Virginia section of Appendix D for the facts and data used to evaluate the borrower distribution of the bank's home mortgage refinance loan originations.

The borrower distribution of refinance loans is poor. This conclusion is a blend of the bank's performance in both analysis periods.

For 2012/2013, the bank made one refinance loan and this loan was not to a low- or moderate-income borrower. The overall level of lending is poor and had a negative impact on the performance conclusion for this area.

For 2014/2015, the bank's borrower distribution of loans is adequate. Their distribution of loans to low-income families is significantly lower than the percentage of low-income families. However, the bank's distribution of loans to moderate-income families exceeds the percentage of moderate-income families in the AA. The bank's 2014 market share performance is also adequate. WNB made no refinance loans in 2014 to low-income borrowers in this AA. However, their market share to moderate-income borrowers significantly exceeds their overall market share of loans to all borrowers.

### ***Consumer Loans***

Refer to Tables 13 in the state of West Virginia section of Appendix D for the facts and data used to evaluate the borrower income distribution of the bank's consumer loan originations.

The borrower distribution of consumer loans is adequate. This conclusion is a blend of the bank's performance in both analysis periods.

For 2012/2013, the bank made 14 loans. Nine loans were made to low-income borrowers and two were made to moderate-income borrowers. The bank's distribution of loans indicate a willingness to make loans to low- and moderate-income borrowers. However, the overall level of lending is poor and had a negative impact on the performance conclusion for this area.

For 2014/2015, the bank's borrower distribution of consumer loans is excellent. The distribution of loans to both low- and moderate-income households exceeds the percentage of these households in the AA. Market share data is not available for consumer loans.

### **Community Development Lending**

Refer to Tables 1 Lending Volume in the state of West Virginia section of Appendix D for the facts and data used to evaluate the bank's level of community development lending. The combined totals on these tables include all CD loans, including multifamily loans that qualified for CD purposes during the evaluation period.

Community development lending is adequate and had a neutral impact on lending performance in the Huntington AA. The bank originated one CD loan in the AA totaling \$20,000 or 14 percent of allocated Tier One Capital.

The loan provided financing to promote affordable housing, financial wellness, and community economic development to empower low-income families and communities. The loan was not considered complex or innovative but demonstrated adequate responsiveness to addressing the economic development needs in the AA.

### **Product Innovation and Flexibility**

WNB has established a lending partnership with a nationwide mortgage lender in manner that ensures that a full array of mortgage financing products are available to serve the full market of qualified borrowers in the communities where the bank conducts business. These programs had a neutral impact on the bank's lending performance.

### **Conclusions for Areas Receiving Limited-Scope Reviews**

Based on limited-scope reviews, the bank's overall performance in the Beckley MSA, Charleston MSA, Hagerstown MSA, Logan County, Nicholas and Webster Counties, and Norther WVA Non-MSA AAs is not inconsistent with the bank's performance in the full-scope AA.

The performance in these AAs can be attributed to their nominal lending activity. The bank's performance in the limited-scope AAs did not impact the overall Lending Test rating for the state.

Refer to Tables 1 through 13 in the state of West Virginia section of Appendix D for the facts and data that support these conclusions.

### **INVESTMENT TEST**

WNB's performance under the Investment Test in West Virginia is rated Low-Satisfactory. Based upon a full-scope review, the bank's performance in the Huntington AA is adequate.

### **Conclusions for Areas Receiving Full-Scope Reviews**

Refer to Table 14 in Appendix D for the facts and data used to evaluate the bank's level of qualified investments.

The level of CD investments in the Huntington AA is adequate based on the available opportunities in the area and the responsiveness to identified needs. There is ample opportunity to make qualified CD investments in the Huntington AA. During the evaluation period, WNB made one investment in this AA for \$135,000, which represents 94 percent of allocated Tier One Capital for the full-scope AA.

WNB's qualified investment was comprised of one MBS, where the underlying home mortgages were to low- to moderate-income borrowers in the AA.

Affordable housing is a need in this AA and the bank's investment demonstrates adequate responsiveness to meeting this need.

WNB did not originate any grants or donations to local community development organizations.

## **Conclusions for Areas Receiving Limited-Scope Reviews**

Based on limited-scope reviews, the bank's performance under the Investment Test in the Hagerstown-Martinsburg and Northern Non-MSA AA is stronger than the bank's performance in the full-scope AA. The volume of investments made in these AAs is greater. Performance in the Beckley AA and Webster Counties AA is not inconsistent with the bank's performance in the full-scope AA.

The bank's performance in the Charleston AA, Logan County AA and Nicholas AA is weaker as the quality and volume of investments made in these areas is less. These AAs represent 41.96 percent of the deposits in the state. The combined performance in the limited-scope AAs did not have a significant impact on the overall Investment Test rating for the state.

Refer to Table 14 in Appendix D for the facts and data used to evaluate the bank's level of qualified investments.

## **SERVICE TEST**

The bank's performance under the Service Test in West Virginia is rated Needs to Improve. Based on a full-scope review, the bank's performance in the Huntington AA is poor.

## **Conclusions for Areas Receiving Full-Scope Reviews**

### **Retail Banking Services**

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

The bank's delivery systems are unreasonably inaccessible to portions of the AA, particularly low- and moderate-income geographies and individuals.

WNB operates one banking office in the Huntington AA, which is located in a Wal-Mart store. The branch is not located in a low-income CT or in a moderate-income CT. Therefore, the percentage of branches in low- and moderate-income tracts is significantly lower than the percentage of the population that resides in these tracts. While only 5.98 percent of the population resides in these low-income tracts, 19.35 percent of the population resides in moderate-income tracts.

During the evaluation period, there was one banking office closed in the full-scope review area. The office was located in a middle-income tract. This closure was due to unprofitable performance and low customer traffic.



The branch closure has not adversely affected the accessibility of delivery systems, particularly in low- or moderate-income geographies or to low- or moderate-income families in the area.

## **Community Development Services**

In the Huntington AA, WNB's record of providing CD services is adequate based on the opportunities in the AA. We identified a limited number of non-profit organizations that operate in this AA. During this evaluation period, WNB primarily provided financial literacy training using the FDIC's Money Smart program and held classes totaling 81 hours for low- and moderate-income individuals in the area. The bank has a bank officer serving on the board of an organization that provides services to low- and moderate-income families and another bank officer on the board of a food bank.

## **Conclusions for Areas Receiving Limited-Scope Reviews**

Based on limited-scope reviews, the bank's performance under the Service Test in the Beckley MSA, Charleston MSA, Logan County, Nicholas and Webster Counties, and the Northern Non-MSA is not inconsistent with the bank's performance in the full-scope AA. These AAs represent 83.48 percent of the state's total deposits.

The performance in the Hagerstown Martinsburg MSA is stronger than the performance in the full-scope AA. The stronger performance is attributable to a stronger branch distribution in the moderate-income tracts. This AA represent 6.91 percent of the state's total deposits. Overall, performance in the limited-scope AAs did not impact the overall Service Test rating in the state.

## Appendix A: Scope of Evaluation

The following table identifies the time period covered in this evaluation, affiliate activities that were reviewed, and loan products considered. The table also reflects the metropolitan and nonmetropolitan areas that received comprehensive examination review (designated by the term “full-scope”) and those that received a less comprehensive review (designated by the term “limited-scope”).

Time Period Reviewed	Lending Test (excludes CD loans): 01/01/12 to 06/30/15 Investment & Service Tests & CD Loans: 07/23/12 to 07/13/15		
Financial Institution		Products Reviewed	
Woodforest National Bank (WNB) The Woodlands, TX		HMDA, small loans to businesses and consumer loans. CD loans, investments and services.	
Affiliate(s)	Affiliate Relationship	Products Reviewed	
None		N/A	
List of Assessment Areas and Type of Examination			
Assessment Area	MSA #	Type of Exam	Counties
Multistate MSA			
Charlotte-Concord-Gastonia NC-SC	16740	Full-scope	Cabarrus, Gaston, Iredell, Lincoln, Mecklenburg, Rowan, Union (NC); Lancaster, York (SC)
Chicago-Naperville-Arlington Heights IL MD	16974	Full scope	Cook, DuPage, Grundy, Kendall, McHenry, Will
Elgin IL MD	20994	Limited scope	DeKalb, Kane
Lake County IL MD	29404	Limited scope	Lake
Gary IN MD	23844	Limited scope	Jasper, Lake, Newton, Porter
Cincinnati OH-KY-IN	17140	Full scope	Dearborn (IN); Campbell (KY); Brown, Butler, Clermont, Hamilton, Warren (OH)
Louisville-Jefferson County KY-IN	31140	Full scope	Harrison (IN); Jefferson, Oldham (KY)
Myrtle Beach-Conway-N. Myrtle Beach SC-NC	34820	Full scope	Brunswick (NC); Horry (SC)
Washington-Arlington-Alexandria DC-VA MD	47894	Full scope	Prince George (MD); Arlington, Clarke, Fairfax, Fauquier, Loudoun, Prince William, Spotsylvania, Stafford, Warren (VA)
Silver Spring-Frederick-Rockville MD	43524	Limited scope	Frederick, Montgomery

Texas			
Houston-The Woodlands-Sugar Land TX MSA	26420	Full scope	Austin, Brazoria, Fort Bend, Galveston, Harris, Liberty, Montgomery
San Antonio-New Braunfels TX MSA	41700	Full scope	Bexar, Guadalupe, Kendall, Medina
Amarillo TX MSA	11100	Limited scope	Potter, Randall
Austin-Round Rock TX MSA	12420	Limited scope	Bastrop, Hays, Travis, Williamson
Beaumont-Port Arthur TX MSA	13140	Limited scope	Jefferson
Brownsville-Harlingen TX MSA	15180	Limited scope	Cameron
Cooke County TX		Limited scope	Cooke
Dallas-Plano-Irving TX MD	19124	Limited scope	Collin, Dallas, Denton
East Texas Non-MSA		Limited scope	Henderson, Limestone, Navarro, Van Zandt
Fort Worth-Arlington TX MD	23104	Limited scope	Johnson, Tarrant
Gillespie County TX		Limited scope	Gillespie
Harrison County TX		Limited scope	Harrison
Howard County TX		Limited scope	Howard
Longview TX MSA	30980	Limited scope	Gregg, Rusk
Northeast TX Non-MSA		Limited scope	Camp, Cass, Marion, Morris, Titus
Shelby County TX		Limited scope	Shelby
Sherman-Denison TX MSA	43300	Limited scope	Grayson
Southeast TX Non-MSA		Limited scope	Colorado, Fayette, Matagorda Washington, Wharton
Southern TX Non-MSA		Limited scope	Bee, Calhoun, Refugio
Texarkana TX MSA	45500	Limited scope	Bowie
Tyler TX MSA	46340	Limited scope	Smith

Alabama			
Huntsville AL MSA	26620	Full scope	Limestone, Madison
Anniston-Oxford-Jacksonville AL MSA	11500	Limited scope	Calhoun
Birmingham-Hoover AL MSA	13820	Limited scope	Chilton, Jefferson, Shelby
Cherokee County AL		Limited scope	Cherokee
Cullman and Marshall Counties AL		Limited scope	Cullman, Marshall
Daphne-Fairhope-Foley AL MSA	19300	Limited scope	Baldwin
Decatur AL MSA	19460	Limited scope	Lawrence, Morgan
Mobile AL MSA	33660	Limited scope	Mobile
Montgomery AL MSA	33860	Limited scope	Autauga, Elmore, Lowndes, Montgomery
Southern AL Non-MSA		Limited scope	Butler, Coffee, Conecuh, Covington, Escambia, Monroe
Tuscaloosa AL MSA	46220	Limited scope	Tuscaloosa
Florida			
Jacksonville FL MSA	27260	Full scope	Duval
Ocala FL MSA	36100	Limited scope	Marion
Pensacola-Ferry Pass-Brent FL MSA	37860	Limited scope	Escambia, Santa Rosa
Tampa-St. Petersburg-Clearwater FL MSA	45300	Limited scope	Hernando
Georgia			
Atlanta-Sandy Springs-Roswell GA MSA	12060	Full scope	Clayton, Coweta, DeKalb, Fulton, Gwinnett, Walton
Macon GA MSA	31420	Limited scope	Monroe
Illinois			
Northern IL Non-MSA		Full scope	La Salle, Lee, Livingston, Ogle, Stephenson, Whiteside
Bloomington IL MSA	14010	Limited scope	McLean
Carbondale-Marion IL MSA	16060	Limited scope	Jackson, Williamson

Central IL Non-MSA		Limited scope	Brown, Cass, Fulton, Knox, Mason, McDonough, Morgan, Schuyler, Warren
Champaign-Urbana IL MSA	16580	Limited scope	Champaign, Ford, Piatt
Coles County IL		Limited scope	Coles
Crawford County IL		Limited scope	Crawford
Danville IL MSA	19180	Limited scope	Vermilion
Davenport-Moline-Rock Island IL MSA	19340	Limited scope	Henry, Mercer, Rock Island
Decatur IL MSA	19500	Limited scope	Macon
Kankakee IL MSA	28100	Limited scope	Kankakee
Peoria IL MSA	37900	Limited scope	Marshall, Peoria, Stark, Tazewell, Woodford
Rockford IL MSA	40420	Limited scope	Winnebago
St. Louis IL MSA	41180	Limited scope	Bond, Calhoun, Clinton, Jersey, Macoupin, Madison, Monroe, St. Clair
Southern IL Non-MSA		Limited scope	Franklin, Jefferson, Saline
Springfield IL MSA	44100	Limited scope	Menard, Sangamon
Indiana			
Southern IN Non-MSA		Full scope	Daviess, Dubois, Gibson, Jackson, Knox, Lawrence, Martin, Perry, Pike
Adams County IN		Limited scope	Adams
Bloomington IN MSA	14020	Limited scope	Monroe
Clinton County IN		Limited scope	Clinton
Columbus IN MSA	18020	Limited scope	Bartholomew
Elkhart-Goshen IN MSA	21140	Limited scope	Elkhart
Evansville IN MSA	21780	Limited scope	Posey, Vanderburgh, Warrick
Fort Wayne IN MSA	23060	Limited scope	Allen, Wells, Whitley

Henry County IN		Limited-scope	Henry
Indianapolis-Carmel-Anderson IN MSA	26900	Limited-scope	Boone, Brown, Hamilton, Hancock, Hendricks, Johnson, Madison, Marion, Morgan, Putnam, Shelby
Lafayette-West Lafayette IN MSA	29200	Limited scope	Tiptecanoe
Michigan City-La Porte IN MSA	33140	Limited scope	La Porte
Muncie IN MSA	34620	Limited scope	Delaware
Northern IN Non-MSA		Limited scope	DeKalb, Huntington, Kosciusko, Marshall, Noble, Starke, Wabash
South Bend-Mishawaka IN MSA	43780	Limited scope	St. Joseph
Terre Haute IN MSA	45460	Limited scope	Clay, Sullivan, Vigo
Kentucky			
Lexington-Fayette KY MSA	30460	Full scope	Clarke, Fayette, Jessamine
Adair County KY		Limited scope	Adair
Bowling Green KY MSA	14540	Limited scope	Edmonson, Warren
Central KY Non-MSA		Limited scope	Anderson, Boyle, Franklin, Garrard, Jackson, Knox, Laurel, Madison, Marion, Mercer, Rockcastle, Washington, Whitley
Elizabethtown-Fort Knox KY MSA	21060	Limited scope	Hardin, Larue
Harrison County KY		Limited scope	Harrison
Owensboro KY MSA	36980	Limited scope	Daviess
Rowan County KY		Limited scope	Rowan
Southwest KY Non-MSA		Limited scope	Calloway, Graves, Marshall, McCracken
Western KY Non-MSA		Limited scope	Caldwell, Hopkins, Logan, Muhlenberg
Louisiana			
Southern LA Non-MSA		Full scope	Evangeline, Jefferson Davis, St. Landry
Alexandria LA MSA	10780	Limited scope	Grant, Rapides

Baton Rouge LA MSA	12940	Limited scope	East Baton Rouge
Hammond LA MSA	25220	Limited scope	Tangipahoa
Houma-Thibodaux MSA	26380	Limited scope	Lafourche, Terrebonne Parish
Lafayette LA MSA	29180	Limited scope	Acadia, Lafayette, St. Martin
Lake Charles LA MSA	29340	Limited scope	Calcasieu, Cameron
Lincoln Parish LA		Limited scope	Lincoln
Monroe LA MSA	33740	Limited scope	Ouachita, Union
Morehouse Parish LA		Limited scope	Morehouse
New Orleans- Metairie LA MSA	35380	Limited scope	Jefferson, Orleans, Plaquemines, St. Bernard, St. Charles, St. John the Baptist, St. Tammany
Shreveport-Bossier City LA MSA	43340	Limited scope	Caddo
Maryland			
Salisbury MD MSA	41540	Full scope	Somerset, Wicomico, Worcester
Baltimore-Columbia-Towson MD MSA	12580	Limited scope	Anne Arundel, Baltimore, Carroll, Harford, Howard, Queen Anne's
California-Lexington Park MD MSA	15680	Limited scope	St. Mary's
Mississippi			
Gulfport-Biloxi-Pascagoula MS MSA	25060	Full scope	Hancock, Harrison, Jackson
Eastern MS Non-MSA		Limited scope	Clay, Kemper, Lauderdale, Lowndes, Monroe, Noxubee, Oktibbeha
Jackson MS MSA	27140	Limited scope	Copiah, Hinds
Lincoln and Pike Counties MS		Limited scope	Lincoln, Pike
Memphis MS MSA	32820	Limited scope	Tate
Northern MS Non-MSA		Limited scope	Alcorn, Lafayette, Lee, Prentiss, Pontotoc
Warren County MS		Limited scope	Warren
Western MS Non-MSA		Limited scope	Bolivar, Carroll, Coahoma, Grenada, Holmes, Humphreys, Leflore,

			Sunflower, Tallahatchie, Washington
New York			
Utica-Rome NY MSA	46540	Full scope	Herkimer, Oneida
Albany-Schenectady-Troy NY MSA	10580	Limited scope	Albany, Schenectady
Buffalo-Cheektowaga-Niagara Falls NY MSA	15380	Limited scope	Erie, Niagara
Elmira NY MSA	21300	Limited scope	Chemung
Montgomery and Otsego Counties NY		Limited	Montgomery, Otsego
Northern NY Non-MSA		Limited scope	Franklin, St. Lawrence
Rochester NY MSA	40380	Limited scope	Livingston, Monroe, Ontario, Orleans, Wayne
Seneca County NY		Limited scope	Seneca
Syracuse NY MSA	45060	Limited scope	Madison, Onondaga, Oswego
Watertown-Fort Drum NY MSA	48060	Limited scope	Jefferson
Western NY Non-MSA		Limited scope	Allegany, Chautauqua, Cattaraugus, Genesee, Wyoming
North Carolina			
Winston-Salem NC MSA	49180	Full scope	Davie, Davidson
Anson and Stanly Counties NC		Limited scope	Anson, Stanly
Asheville NC MSA	11700	Limited scope	Buncombe, Haywood, Henderson, Madison
Burlington NC MSA	15500	Limited scope	Alamance
Carteret County NC		Limited scope	Carteret
Cleveland and Rutherford Counties NC		Limited scope	Cleveland, Rutherford
Duplin County NC		Limited scope	Duplin
Durham-Chapel Hill NC MSA	20500	Limited scope	Chatham, Durham, Orange, Person
Fayetteville NC MSA	22180	Limited scope	Cumberland



Goldsboro NC MSA	24140	Limited scope	Wayne
Granville and Vance Counties NC		Limited scope	Granville, Vance
Greensboro-High Point NC MSA	24660	Limited scope	Guilford, Randolph, Rockingham,
Greenville NC MSA	24780	Limited scope	Pitt
Hickory-Lenoir-Morganton NC MSA	25860	Limited scope	Caldwell, Catawba
Jacksonville NC MSA	27340	Limited scope	Onslow
Mitchell County NC		Limited scope	Mitchell
New Bern NC MSA	35100	Limited scope	Craven, Jones
Northern NC Non-MSA		Limited scope	Halifax, Martin, Northampton, Vance, Warren
Pasquotank County NC		Limited scope	Pasquotank
Raleigh NC MSA	39580	Limited scope	Franklin, Johnston, Wake
Rocky Mount NC MSA	40580	Limited scope	Edgecombe, Nash
South Central NC Non-MSA		Limited scope	Columbus, Harnett, Lee, Moore, Roberson, Scotland
Surry and Wilkes Counties NC		Limited scope	Surry, Wilkes
Ohio			
Toledo OH MSA	45780	Full scope	Fulton, Lucas, Wood
Akron OH MSA	10420	Limited scope	Portage, Summit
Canton-Massillon OH MSA	15940	Limited scope	Carroll, Stark
Central OH Non-MSA		Limited scope	Ashland, Coshocton, Guernsey, Holmes, Huron, Knox, Muskingum, Seneca, Sandusky, Tuscarawas, Wayne
Cleveland-Elyria OH MSA	17460	Limited scope	Cuyahoga, Geauga, Lake, Lorain, Medina
Columbiana County OH		Limited scope	Columbiana
Columbus OH MSA	18140	Limited scope	Delaware, Fairfield, Franklin, Licking, Madison, Morrow, Pickaway, Union

Dayton OH MSA	19380	Limited scope	Greene, Miami, Montgomery
Erie and Ottawa Counties OH		Limited scope	Erie, Ottawa
Lima OH MSA	30620	Limited scope	Allen
Mansfield OH MSA	31900	Limited scope	Richland
Northwest OH Non-MSA		Limited scope	Defiance, Henry, Mercer, Paulding, Putnam, Van Wert, Williams
Preble County OH		Limited scope	Preble
Southern OH Non-MSA		Limited scope	Adams, Clinton, Fayette, Highland, Pike, Ross, Scioto
Springfield OH MSA	44220	Limited scope	Clark
Western OH Non-MSA		Limited scope	Auglaize, Champaign, Hancock, Hardin, Logan
Wheeling OH MSA	48540	Limited scope	Belmont
Youngstown-Warren OH MSA	49660	Limited scope	Mahoning, Trumbull
Pennsylvania			
Montgomery-Bucks-Chester Counties PA MD		Full scope	Bucks, Chester, Montgomery
Allentown-Bethlehem-Easton PA MSA	10900	Limited scope	Carbon, Lehigh
Altoona PA MSA	11020	Limited scope	Blair
Chambersburg-Waynesboro PA MSA	16540	Limited scope	Franklin
East Stroudsburg PA MSA	20700	Limited scope	Monroe
Erie PA MSA	21500	Limited scope	Erie
Greene County PA		Limited scope	Greene
Harrisburg-Carlisle PA MSA	25420	Limited scope	Cumberland
Johnstown PA MSA	27780	Limited scope	Cambria
Lancaster PA MSA	29540	Limited scope	Lancaster
Lebanon PA MSA	30140	Limited scope	Lebanon

Newark PA MSA	35084	Limited scope	Pike
Northumberland, Schuylkill and Union Counties PA		Limited scope	Northumberland, Schuylkill, Union
Pittsburgh PA MSA	38300	Limited scope	Allegheny, Armstrong, Beaver, Butler, Fayette, Washington, Westmoreland
Reading PA MSA	39740	Limited scope	Berks
Scranton-Wilkes-Barre- Hazleton PA MSA	42540	Limited scope	Lackawanna, Luzerne
State College PA MSA	44300	Limited scope	Centre
Warren and Venango Counties PA		Limited scope	Elk, Venango, Warren
Wayne County PA		Limited scope	Wayne
York-Hanover PA MSA	49620	Limited scope	York
South Carolina			
Columbia SC MSA	17900	Full scope	Calhoun, Fairfield, Kershaw, Lexington, Richland, Saluda
Augusta-Richmond County SC MSA	12260	Limited scope	Aiken
Charleston-North Charleston SC MSA	16700	Limited scope	Berkeley, Charleston, Dorchester
Cherokee County SC		Limited scope	Cherokee
Colleton County SC		Limited scope	Colleton
Greenville-Anderson- Mauldin SC MSA	24860	Limited scope	Anderson, Greenville, Laurens, Pickens
Greenwood County SC		Limited scope	Greenwood
Hilton Head Island- Bluffton-Beaufort SC MSA	25940	Limited scope	Beaufort
Northern SC Non-MSA		Limited scope	Chesterfield, Dillon, Marion, Marlboro
Oconee County SC		Limited scope	Oconee
Spartanburg SC MSA	43900	Limited scope	Spartanburg, Union

Virginia			
Richmond VA MSA	40060	Full scope	Chesterfield, Hanover, Henrico
Accomack County VA		Limited scope	Accomack
Blacksburg-Christiansburg- Radford VA MSA	13980	Limited scope	Floyd, Giles, Montgomery, Pulaski
Central VA Non-MSA		Limited scope	Rockbridge
Harrisonburg VA MSA	25500	Limited scope	Rockingham
Kingsport-Bristol VA MSA	28700	Limited scope	Washington
Lee and Wise Counties and Norton City VA		Limited scope	Lee, Wise
Louisa County VA		Limited scope	Louisa
Lynchburg VA MSA	31340	Limited scope	Amherst, Appomattox, Bedford, Campbell
Northumberland and Lancaster Counties VA		Limited scope	Lancaster, Northumberland
Prince Edward County VA		Limited scope	Prince Edward
Roanoke VA MSA	40220	Limited scope	Botetourt, Craig, Franklin, Roanoke; Salem City
Southwest VA Non-MSA		Limited scope	Bland, Carroll, Grayson, Henry, Patrick, Pittsylvania, Smyth, Tazewell, Wythe
Staunton-Waynesboro VA MSA	44420	Limited scope	Augusta, Staunton and Waynesboro cities
Virginia Beach-Norfolk-Newport News VA MSA	47260	Limited scope	Gloucester, Isle of Wright, James City, Mathews, York; cities of Chesapeake, Hampton, Norfolk, Portsmouth, Suffolk, Virginia Beach
West Virginia			
Huntington-Ashland WV MSA	26580	Full scope	Cabell, Lincoln, Putnam
Beckley WV MSA	13220	Limited scope	Fayette, Raleigh
Charleston WV MSA	16620	Limited scope	Boone, Clay, Kanawha
Hagerstown-Martinsburg WV MSA	25180	Limited scope	Berkeley
Logan County WV		Limited scope	Logan

Nicholas County WV		Limited scope	Nicholas
Northern WV Non-MSA		Limited scope	Barbour, Harrison, Marion, Randolph, Taylor

## Appendix B: Summary of Multistate Metropolitan Area and State Ratings

RATINGS		Woodforest National Bank		
Overall Bank:	Lending Test Rating*	Investment Test Rating	Service Test Rating	Overall Bank/State/Multistate Rating
Woodforest NB	Low Satisfactory	Outstanding	Low Satisfactory	Satisfactory
Multistate Metropolitan Area or State:				
Charlotte MMSA	High Satisfactory	High Satisfactory	High Satisfactory	Satisfactory
Chicago MMSA	Low Satisfactory	High Satisfactory	Needs to Improve	Satisfactory
Cincinnati MMSA	Low Satisfactory	High Satisfactory	Low Satisfactory	Satisfactory
Louisville MMSA	Low Satisfactory	High Satisfactory	Needs to Improve	Satisfactory
Myrtle Beach MMSA	Low Satisfactory	High Satisfactory	Low Satisfactory	Satisfactory
Washington, DC MMSA	High Satisfactory	High Satisfactory	Low Satisfactory	Satisfactory
State of Texas	High Satisfactory	Outstanding	High Satisfactory	Satisfactory
State of Alabama	Low Satisfactory	Outstanding	Low Satisfactory	Satisfactory
State of Florida	Low Satisfactory	High Satisfactory	Low Satisfactory	Satisfactory
State of Georgia	Low Satisfactory	High Satisfactory	High Satisfactory	Satisfactory
State of Illinois	Low Satisfactory	Low Satisfactory	Needs to Improve	Needs to Improve
State of Indiana	Low Satisfactory	Outstanding	Low Satisfactory	Satisfactory
State of Kentucky	Low Satisfactory	High Satisfactory	High Satisfactory	Satisfactory
State of Louisiana	Needs to Improve	High Satisfactory	Low Satisfactory	Needs to Improve
State of Maryland	Needs to Improve	High Satisfactory	Needs to Improve	Needs to Improve
State of Mississippi	Low Satisfactory	Needs to Improve	Needs to Improve	Needs to Improve
State of New York	Low Satisfactory	High Satisfactory	Needs to Improve	Satisfactory
State of North Carolina	Low Satisfactory	Outstanding	Low Satisfactory	Satisfactory
State of Ohio	Low Satisfactory	Outstanding	Needs to Improve	Satisfactory
State of Pennsylvania	Low Satisfactory	Outstanding	Low Satisfactory	Satisfactory
State of South Carolina	Low Satisfactory	Outstanding	Low Satisfactory	Satisfactory
State of Virginia	High Satisfactory	Low Satisfactory	High Satisfactory	Satisfactory
State of West Virginia	Needs to Improve	Low Satisfactory	Needs to Improve	Needs to Improve

(\*) The overall rating is determined from overall levels of performance under each of the lending, investment and service test.

## Appendix C: Market Profiles for Full-Scope Areas

### Charlotte MMSA

#### 2012 Charlotte-Gastonia-Rock Hill NC-SC Multistate

Demographic Information for Full Scope Area: 2012 Charlotte-Gastonia-Rock Hill NC-SC Multistate						
Demographic Characteristics	#	Low % of #	Moderate % of #	Middle % of #	Upper % of #	NA* % of #
Geographies (Census Tracts/BNAs)	428	10.05	22.43	32.01	34.35	1.17
Population by Geography	1,758,038	7.72	20.55	34.19	37.41	0.12
Owner-Occupied Housing by Geography	439,291	3.87	16.63	36.46	43.03	0.01
Business by Geography	161,672	8.37	16.37	29.29	44.90	1.07
Farms by Geography	3,809	4.80	16.54	45.02	33.42	0.21
Family Distribution by Income Level	435,147	20.11	16.93	20.12	42.85	0.00
Distribution of Low and Moderate Income Families throughout AA Geographies	161,154	13.98	32.08	35.55	18.40	0.00
Median Family Income FFIEC estimated MFI for 2012 Households Below Poverty Level		64,787 68,500 12%	Median Housing Value Unemployment Rate (2010 US Census)		188,857 4.70%	

(\*) The NA category consists of geographies that have not been assigned an income classification.  
Source: 2010 US Census and 2012 FFIEC estimated MFI

#### 2014 Charlotte-Concord-Gastonia NC-SC MSA

Demographic Information for Full Scope Area: 2014 Charlotte-Concord-Gastonia NC-SC MSA						
Demographic Characteristics	#	Low % of #	Moderate % of #	Middle % of #	Upper % of #	NA* % of #
Geographies (Census Tracts/BNAs)	528	9.09	24.43	35.04	30.49	0.95
Population by Geography	2,183,872	7.00	23.15	37.27	32.48	0.10
Owner-Occupied Housing by Geography	556,956	3.50	20.07	39.72	36.70	0.01
Business by Geography	170,377	7.63	18.41	32.70	40.38	0.88
Farms by Geography	4,536	3.55	20.15	47.84	28.24	0.22
Family Distribution by Income Level	548,811	21.30	17.43	20.41	40.86	0.00
Distribution of Low and Moderate Income Families throughout AA Geographies	212,561	12.31	34.87	37.46	15.35	0.00
Median Family Income FFIEC estimated MFI for 2014 Households Below Poverty Level		61,974 65,500 12%	Median Housing Value Unemployment Rate (2010 US Census)		183,364 4.67%	

(\*) The NA category consists of geographies that have not been assigned an income classification.  
Source: 2010 US Census and 2014 FFIEC estimated MFI

The Charlotte-Concord-Gastonia NC-SC Multi-State MSA AA (Charlotte AA) encompasses the counties of Cabarrus, Gaston, Iredell, Lincoln, Mecklenburg, Rowan and Union in North Carolina, and Lancaster and York counties in South Carolina. The counties of Iredell and Lincoln, North Carolina and Lancaster County, and South Carolina joined the AA in 2014.



WNB operates 18 banking offices in the Charlotte AA. These branches are all non-traditional in-store offices located in Wal-Mart stores. WNB had \$26 million in deposits in this AA according to June 30, 2014 deposit information.

### Employment and Economic Factors

Charlotte is the largest city in North Carolina and the 33rd largest city in the nation based on U.S. Census Bureau information as of 2010. The U.S. Bureau of Labor Statistics showed that the April 2015 unemployment rate for the MMSA was 5.1 percent, which was lower than the unemployment rate of 5.2 percent for North Carolina, and 6.1 percent for South Carolina.

According to the City of Charlotte and Charlotte-Mecklenburg Consortium as of April 2015, the region has on-going needs for a wide range of community services. Soft services supporting housing are in demand to help citizens understand the home buying process or locate suitable housing. Credit continues to be a significant barrier to homeownership, especially for low- and moderate-income families. After school educational enrichment opportunities provide continuing education for school age children outside the regular school day. Charlotte has a diverse and robust business community. For local companies to grow, they require a built environment that meets various transportation needs and information technology architecture as well as a workforce with specific skill sets for each industry. Charlotte continues to provide support to growing businesses and partners with academic and skill development organizations to meet the needs of a changing workforce requiring an increasing number of skills and specialties.

The Charlotte Chamber of Commerce stated that in 2013, the City is a regional hub for banking and education. It is home to the national headquarters for Bank of America, N.A. Other financial institutions with a significant presence in the area include Wells Fargo, N.A., Branch Banking & Trust Company, Fifth Third Bank, and First Citizens Bank & Trust Company

### Housing

According to the 2010 Census for 2014 activity within the Charlotte AA, 62.31 percent of the housing units are owner occupied, 28.01 percent are renter occupied, and 9.68 percent of the housing units are vacant. The median housing value was \$183,364 and median monthly gross rent was \$777. In addition, 16.49 percent of homeowners and 12.22 percent of renters had home-related costs that exceeded 30.00 percent of their income.

Additionally, 23.57 percent of all owner occupied units and 46.44 percent of renter occupied units were located in LMI CTs. Further, the census information stated that 29.10 percent of all single family (1-4 units) homes and 42.54 percent multifamily (5+ unit) housing units were located in LMI CTs.

### Competition

Banking competition is intense in the Charlotte AA. According to FDIC information as of June 30, 2014, the five largest competitors include Bank of America, N.A., Wells Fargo Bank, N.A., Branch Banking & Trust Company, Fifth Third Bank, and First Citizens Bank & Trust Company. According to the same FDIC information, WNB is ranked 43<sup>rd</sup> of 49 banks in the Charlotte AA for market share of deposits with a 0.01 percent market share.

### Community Contact

To help identify needs and opportunities in the AA, our Community Affairs Officer interviewed a governmental council for economic development in the MMSA. The council assists municipalities and county governments with grant writing, consolidation plans, needs assessment, and application for state grants. In addition, the council provides local and regional plans and support in the areas of housing, neighborhood development, land use, zoning, water/sewer systems and personnel management. The representative indicated that more small business loans are needed in the community.

## Chicago MMSA

### 2014 Chicago-Naperville-Arlington Heights IL MD

Demographic Information for Full Scope Area: 2014 Chicago-Naperville-Arlington Heights IL MD						
Demographic Characteristics	#	Low % of #	Moderate % of #	Middle % of #	Upper % of #	NA* % of #
Geographies (Census Tracts/BNAs)	1,758	13.71	22.81	31.97	31.23	0.28
Population by Geography	7,262,718	9.57	22.44	34.32	33.67	0.00
Owner-Occupied Housing by Geography	1,747,808	4.19	16.81	38.14	40.86	0.00
Business by Geography	446,300	4.82	15.14	32.43	47.47	0.13
Farms by Geography	7,051	2.67	11.23	41.14	44.93	0.03
Family Distribution by Income Level	1,734,806	22.74	16.67	19.34	41.25	0.00
Distribution of Low and Moderate Income Families throughout AA Geographies	683,628	16.93	32.43	33.58	17.07	0.00
Median Family Income		72,196	Median Housing Value		290,729	
FFIEC estimated MFI for 2014		76,300	Unemployment Rate		4.80%	
Households Below Poverty Level		12%	(2010 US Census)			

(\*) The NA category consists of geographies that have not been assigned an income classification.

Source: 2010 US Census and 2014 FFIEC estimated MFI

The bank's Chicago-Naperville-Arlington Heights IL MD AA (Chicago AA) encompasses the counties of Cook, DuPage, Grundy, Kendall, McHenry and Will counties in Illinois. The Chicago AA is one of four MDs that is part of the Chicago MMSA. The other three MDs are Elgin, IL; Lake County, IL and Gary, IN.

WNB operates nine banking offices in the Chicago AA. This represents 50 percent of the bank's banking offices in the Chicago MMSA. WNB had \$12 million in deposits in this AA according to June 30, 2014 information.

### Employment and Economic Factors

Chicago is the largest city in Illinois and the third largest city in the nation based on U.S. Census Bureau information as of 2010. The U.S. Bureau of Labor Statistics showed that the April 2015 unemployment rate for the MSA was 5.8 percent, which was higher than the unemployment rate of 5.5 percent for Illinois.

As a transportation hub, the Federal Aviation Administration listed the Chicago's O'Hare airport as the busiest airport in the United States as of 2014. The City is the second largest central business district in the United States behind New York according to Skyscraper Source Media, 2015.

In addition, the US Department of Commerce designated Chicago as one of 12 manufacturing communities in 2014. There are more than 3,700 metal and machining firms in the region employing more than 100,000 people and generating \$30 billion in annual revenue. This industry utilizes the region's transportation strength, including the six Class 1 railroads and the second busiest international cargo airport.

Site Selection Magazine reported Chicago as the Top Metro in North America for corporate relocation and expansions in 2013. The publication recognized that Chicago region was home to more new or expanded corporate facilities than any other metropolitan area in the nation, with 373 new and expanding companies, generating approximately 10,000 new jobs and \$3 billion in investment.

In May 2015, the Business Facilities Magazine stated that the Metro Chicago Exports is comprised of leadership from Cook, DuPage, Kane, Kendall, Lake, McHenry and Will Counties to pursue outcome-based initiatives to grow the regional economy. The magazine indicated that half of the recovery in 100 of the largest metro areas was attributed to exports.

As of December 31, 2014, the ChicagoBusiness.com listed the major employers in Cook County as federal government, Chicago public schools, City of Chicago, Cook County and Advocate Health Care. The remainder of the AA notes the top employers for DuPage County as MacDonal's Corporation; for Grundy County as Morris Hospital; for Kendall County as Caterpillar, Inc.; for McHenry County as Centegra Health System; and for Will County as Presence St. Joseph Medical Center.

### Competition

Banking competition is intense in this AA. According to FDIC information as of June 30, 2014, the five largest competitors include JPMorgan Chase Bank, N.A.; BMO Harris Bank, N.A.; Bank of America, N.A.; The Northern Trust Company; and Fifth Third Bank. According to the same FDIC information, WNB is ranked 173 out of 181 banks in the AA for market share of deposits with a 0.00 percent market share.

### Housing

According to the 2010 Census for 2014 activity within the Chicago AA, 59.55 percent of the housing units are owner occupied, 30.87 percent are renter occupied, and 9.59 percent of the housing units are vacant. The median housing value was \$290,729 and median monthly gross rent was \$948. In addition, 22.82 percent of homeowners and 15.04 percent of renters had home-related costs that exceeded 30.00 percent of their income.

Additionally, 21.57 percent of all owner occupied units and 47.60 percent of renter occupied units were located in LMI CTs. Further, 31.28 percent of all single family (1-4 unit) homes and 34.33 percent multifamily (5+ unit) housing units were located in LMI CTs.

### Community Contact

To help identify needs and opportunities in the AA, our Community Affairs Officer interviewed two community development organizations in the MMSA.

The representative identified the following needs: consumer education programs for LMI borrowers, computer literacy programs and affordable housing. Also, there is a need in the AA for products targeted to the unbanked, as there is a large segment of the population that are not financially literate and do not have a bank account.

## Cincinnati MMSA

### 2012 Cincinnati-Middletown IN-KY-OH Multistate

Demographic Information for Full Scope Area: 2012 Cincinnati-Middletown IN-KY-OH Multistate						
Demographic Characteristics	#	Low % of #	Moderate % of #	Middle % of #	Upper % of #	NA* % of #
Geographies (Census Tracts/BNAs)	419	12.41	23.15	39.86	23.87	0.72
Population by Geography	1,765,789	6.99	19.32	42.90	30.12	0.66
Owner-Occupied Housing by Geography	463,793	2.99	15.54	46.70	34.76	0.00
Business by Geography	140,116	6.15	20.15	40.28	33.38	0.03
Farms by Geography	4,336	2.01	12.68	57.75	27.51	0.05
Family Distribution by Income Level	447,857	20.87	17.05	20.90	41.18	0.00
Distribution of Low and Moderate Income Families throughout AA Geographies	169,815	11.92	27.77	44.49	15.81	0.01
Median Family Income FFIEC estimated MFI for 2012 Households Below Poverty Level		67,016 51,300 12%	Median Housing Value Unemployment Rate (2010 US Census)		163,006 3.89%	

(\*) The NA category consists of geographies that have not been assigned an income classification.  
Source: 2010 US Census and 2012 FFIEC estimated MFI

### 2014 Cincinnati OH-KY-IN MSA

Demographic Information for Full Scope Area: 2014 Cincinnati OH-KY-IN MSA						
Demographic Characteristics	#	Low % of #	Moderate % of #	Middle % of #	Upper % of #	NA* % of #
Geographies (Census Tracts/BNAs)	419	12.41	23.15	39.86	23.87	0.72
Population by Geography	1,765,789	6.99	19.32	42.90	30.12	0.66
Owner-Occupied Housing by Geography	463,793	2.99	15.54	46.70	34.76	0.00
Business by Geography	120,074	6.02	20.13	40.18	33.65	0.02
Farms by Geography	3,871	2.22	12.81	57.63	27.33	0.00
Family Distribution by Income Level	447,857	20.87	17.05	20.90	41.18	0.00
Distribution of Low and Moderate Income Families throughout AA Geographies	169,815	11.92	27.77	44.49	15.81	0.01
Median Family Income FFIEC estimated MFI for 2014 Households Below Poverty Level		67,016 71,100 12%	Median Housing Value Unemployment Rate (2010 US Census)		163,006 3.89%	

(\*) The NA category consists of geographies that have not been assigned an income classification.  
Source: 2010 US Census and 2014 FFIEC estimated MFI

The Cincinnati OH-KY-IN MMSA AA (Cincinnati AA) encompasses the counties of Dearborn in Indiana, Campbell in Kentucky, and Brown, Butler, Clermont, Hamilton, and Warren in Ohio.

WNB operates ten banking offices in the Cincinnati AA. These branches are all non-traditional in-store offices located in Wal-Mart stores. WNB had \$7 million in deposits in this AA according to FDIC information as of June 30, 2014.

## Employment and Economic Factors

The U.S. Bureau of Labor Statistics showed that the April 2015 unemployment rate for the AA was 4.1 percent, which was lower than the unemployment rate of 4.6 percent of Indiana and Ohio, and 4.8 percent of Kentucky.

The Federal Reserve Bank of Cleveland advised in 2014 that the Cincinnati metro area continue to outperform most of the other MSAs in Ohio and throughout the Midwest. The highly educated workforce, diversified industrial base, and several Fortune 300 companies are all contributors to the accelerated recovery. Sectors showing the most strength continue to be professional and business services. The focus of employment in high growth, high demand sectors also prove beneficial in reducing the unemployment rate. Other strong performers are education, healthcare and skilled manufacturing.

From an article in the Cincinnati Business Courier, dated February 27, 2015, Greater Cincinnati added 21,700 jobs during 2014. The financial sector has gained momentum but Greater Cincinnati still relies on manufacturing for most of its jobs. The sector could suffer as the strong dollar and weak overseas economies hurt sales.

The City of Cincinnati Trade and Development listed the city as the home of six Fortune 500 companies and five Fortune 1000 companies such as Kroger, Procter and Gamble, GE Aviation, Fifth Third Bancorp, and Macy's Inc. in April 2014. Consumer products, financial services, and marketing services companies all have a strong presence in Cincinnati. The regional economy has successfully diversified across industries including aerospace, bioscience, chemistry, automotive production, consumer products, marketing and financial services. The largest employers in this AA are Kroger (17,000), University of Cincinnati (15,162), Procter & Gamble Company (14,000), Cincinnati Children's Hospital Medical Center (12,057), and TriHealth Inc. (9,898). More than 45,000 people are employed by foreign companies in Cincinnati, positioning it as an international trade center. Among these companies are: BASF, Givaudan, Krupp-Bilstein, LaFarge, L'Oréal, Luxottica, Mitsubishi Electric, Munich Re, Nestle, Siemens, Snecma Tata Group, Toyota Motor Mfg. - North American Headquarters, Valeo, and ZF.

By June 2015, Cincinnati.com released news on Kroger's investment of \$46 million in two new buildings in Blue Ash (outside of Cincinnati, OH) and its plan to add 650 new jobs. This was one of six companies that were approved for a tax credit. Those deals, plus a recent one for fat-based chemical company, Peter Cremer North America, could result in \$75 million in capital investments and create or retain 2,736 jobs in the greater Cincinnati.

## Housing

According to the 2010 Census for 2014 activity within the Cincinnati AA, 60.82 percent of the housing units are owner occupied, 28.20 percent are renter occupied, and 10.98 percent of the housing units are vacant. The median housing value was \$163,006 and median monthly gross rent was \$702. In addition, 15.97 percent of homeowners and 12.95 percent of renters had home-related costs that exceeded 30.00 percent of their income.

Additionally, 18.79 percent of all owner occupied units and 48.38 percent of renter occupied units were located in LMI CTs. Further, 27.69 percent of all single family (1-4 unit) homes and 44.91 percent multifamily (5+ unit) housing units were located in LMI CTs.

### Competition

Banking competition is intense in this AA. According to FDIC information as of June 30, 2014, the five largest competitors include U. S. Bank, N.A., Fifth Third Bank, PNC Bank, N.A., The Huntington NB, and First Financial Bank, N.A. According to the same FDIC information, WNB is ranked last out of 70 banks in the AA for deposits with a deposit market share of 0.01 percent.

### Community Contact

To help identify needs and opportunities in the Cincinnati AA, our Community Affairs Officer interviewed an affordable housing organization in the MMSA. The representative indicated that LMI residents in the AA need second chance checking accounts, as a way to begin to build or rebuild credit. Also, there is an opportunity for financial institutions in the AA to sponsor workshops to reach the unbanked and provide them with checking and savings account.

**LOUISVILLE MMSA****2012 Louisville-Jefferson County IN-KY Multistate**

Demographic Information for Full Scope Area: 2012 Louisville-Jefferson County IN-KY Multistate						
Demographic Characteristics	#	Low % of #	Moderate % of #	Middle % of #	Upper % of #	NA* % of #
Geographies (Census Tracts/BNAs)	211	16.11	17.06	34.60	31.75	0.47
Population by Geography	840,776	12.42	14.26	40.55	32.77	0.00
Owner-Occupied Housing by Geography	222,966	6.36	11.91	43.38	38.35	0.00
Business by Geography	79,740	12.99	12.02	31.77	42.85	0.36
Farms by Geography	2,051	5.36	9.31	42.08	43.05	0.20
Family Distribution by Income Level	211,601	21.85	16.85	20.03	41.27	0.00
Distribution of Low and Moderate Income Families throughout AA Geographies	81,901	22.22	20.79	40.18	16.81	0.00
Median Family Income FFIEC estimated MFI for 2012 Households Below Poverty Level		59,921 63,800 14%	Median Housing Value Unemployment Rate (2010 US Census)		162,544 4.30%	

(\*) The NA category consists of geographies that have not been assigned an income classification.  
Source: 2010 US Census and 2012 FFIEC estimated MFI

**2014 Louisville-Jefferson County KY-IN MSA**

Demographic Information for Full Scope Area: 2014 Louisville-Jefferson County KY-IN MSA						
Demographic Characteristics	#	Low % of #	Moderate % of #	Middle % of #	Upper % of #	NA* % of #
Geographies (Census Tracts/BNAs)	211	16.11	17.06	34.60	31.75	0.47
Population by Geography	840,776	12.42	14.26	40.55	32.77	0.00
Owner-Occupied Housing by Geography	222,966	6.36	11.91	43.38	38.35	0.00
Business by Geography	66,529	13.48	11.98	31.79	42.39	0.35
Farms by Geography	1,771	4.74	8.92	42.86	43.37	0.11
Family Distribution by Income Level	211,601	21.85	16.85	20.03	41.27	0.00
Distribution of Low and Moderate Income Families throughout AA Geographies	81,901	22.22	20.79	40.18	16.81	0.00
Median Family Income FFIEC estimated MFI for 2014 Households Below Poverty Level		60,164 64,200 14%	Median Housing Value Unemployment Rate (2010 US Census)		162,544 4.30%	

(\*) The NA category consists of geographies that have not been assigned an income classification.  
Source: 2010 US Census and 2014 FFIEC estimated MFI

The Louisville-Jefferson County KY IN MMSA AA (Louisville AA) encompasses the counties of Harrison in Indiana, and Jefferson and Oldham in Kentucky.

WNB operates six banking offices in the Louisville AA. These branches are all non-traditional in-store offices located in Wal-Mart stores. WNB had \$4 million in deposits in this AA at June 30, 2014 based on FDIC information.



## Employment and Economic Factors

The U.S. Bureau of Labor Statistics showed that the April 2015 unemployment rate for the MMSA was 4.4 percent, which was lower than the unemployment rate of 4.6 percent of Indiana and 4.8 percent of Kentucky.

Information obtained from the U.S. Department of Housing and Urban Development publication in April 2013 show economic conditions in the Louisville Housing Market Area (HMA) are improving, following the recovery that began in 2011. During the 12 months ending March 2013, nonfarm payrolls increased 2.6 percent, but residential employment decreased nearly three times faster than the labor force. In this period, small declines occurred in mining, logging, construction, transportation, utilities and other services sectors. Nonfarm payrolls are expected to increase 2.4 percent during the next three years. The Louisville HMA is a major transportation and distribution center, and growing worldwide demand for freight delivery services has buoyed the economy.

Increases were led by gains in the manufacturing sector of 11.2 percent in this period as compared with a year earlier. Manufacturing is the fifth largest payroll sector in the HMA, accounting for 11.8 percent of total nonfarm payroll jobs. Two Ford Motor Company assembly plants operate in the AA. Increased demand for new vehicles has led growth at these two facilities. One manufacturer located in Shelbyville, which produces parts for the Ford Escape SUV that is manufactured in Louisville, added 700 jobs in the early part of 2013. The manufacturing sector is expected to continue to recover. Wilbert, Inc., an injection molding plastics manufacturer that produces interior trim for Ford Motor, Inc., is considering plans to expand in the HMA, adding 100 jobs.

## Housing

According to the 2010 Census for 2014 activity within the Louisville AA, 60.17 percent of the housing units are owner occupied, 30.00 percent are renter occupied, and 9.83 percent of the housing units are vacant. The median housing value was \$162,544 and median monthly gross rent was \$665. In addition, 14.26 percent of homeowners and 13.27 percent of renters had home-related costs that exceeded 30.00 percent of their income.

Additionally, 18.27 percent of all owner occupied units and 45.68 percent of renter occupied units were located in LMI CTs. Further, 25.53 percent of all single family (1-4 unit) homes and 40.89 percent multifamily (5+ unit) housing units were located in LMI CTs.

## Competition

Banking competition is intense in this AA. According to FDIC information as of June 30, 2014, the five largest competitors include PNC Bank, N.A., JPMorgan Chase Bank, N.A., Fifth Third Bank, Stock Yards Bank & Trust Company, and Republic Bank & Trust Company. According to the same FDIC information, WNB is ranked 41 out of 42 banks in the AA for market share of deposits with a 0.02 percent market share.

Community Contact

To help identify needs and opportunities in the AA, our Community Affairs Officer interviewed a financial literacy organization in the MMSA. The Officer also interviewed a government economic development in the MMSA. The representative identified an opportunity to join or create products for the unbanked or to be part of its executive committees. There are also opportunities to provide funding for financial coaching.

## MYRTLE BEACH MMSA

### 2014 Myrtle Beach-Conway-N Myrtle Beach SC-NC MSA

Demographic Information for Full Scope Area: 2014 Myrtle Beach-Conway-N Myrtle Beach SC-NC MSA						
Demographic Characteristics	#	Low % of #	Moderate % of #	Middle % of #	Upper % of #	NA* % of #
Geographies (Census Tracts/BNAs)	105	1.90	15.24	57.14	22.86	2.86
Population by Geography	376,722	1.69	16.39	60.79	21.10	0.02
Owner-Occupied Housing by Geography	114,783	0.51	14.99	60.95	23.55	0.00
Business by Geography	27,706	4.19	14.71	55.62	25.00	0.47
Farms by Geography	930	0.65	17.42	65.70	16.24	0.00
Family Distribution by Income Level	104,103	20.37	17.58	21.55	40.50	0.00
Distribution of Low and Moderate Income Families throughout AA Geographies	39,510	2.64	24.13	58.77	14.45	0.00
Median Family Income FFIEC estimated MFI for 2014 Households Below Poverty Level		52,253 49,600 14%	Median Housing Value Unemployment Rate (2010 US Census)	209,366 4.28%		

(\*) The NA category consists of geographies that have not been assigned an income classification.  
Source: 2010 US Census and 2014 FFIEC estimated MFI

The Myrtle Beach Conway-N Myrtle Beach SC-NC MMSA AA (Myrtle Beach AA) encompasses the counties of Brunswick in North Carolina, and Horry in South Carolina.

WNB operates three banking offices in the Myrtle Beach MMSA. These branches are all non-traditional in-store offices located in Wal-Mart stores. WNB had \$5 million according to June 30, 2014 FDIC information.

### Employment and Economic Factors

The U.S. Bureau of Labor Statistics showed that the April 2015 unemployment rate for the AA was 6.7 percent, which was higher than the unemployment rates of 5.2 percent of North Carolina and 6.1 percent of South Carolina.

The Myrtle Beach Regional Economic Development in 2015 lists the top five employers in Horry County at the school district, Wal-Mart stores, Grand Strand Regional and Conway Medical Centers and Coastal Carolina University. The Brunswick County Economic Development Commission in 2015 lists the top five employers as the board of education, county government, Progress Energy Carolinas, Wal-Mart stores, and Brunswick Community College.

The Horry County Community Profile as of August 2014 provides a breakdown of the economy of the county. Accommodation and Food Service is the top industry followed by Retail Trade. The profile reports that there are 108,751 jobs in the county. Of those, the top two industries contain 47,078 jobs or 43.28 percent.

The SC Department of Employment and Workforce cited more than 10,000 new leisure and hospitality jobs statewide in its September 2014 unemployment report.

A study conducted by STR Analytics stated that Myrtle Beach has the most seasonal hotel occupancy in the country, with a nearly 59 percent swing in occupancy between the high in July and the low in January.

### Housing

According to the 2010 Census for 2014 activity within the Myrtle Beach AA, 45.49 percent of the housing units are owner occupied, 16.92 percent are renter occupied, and 37.59 percent of the housing units are vacant. The median housing value was \$209,366 and median monthly gross rent was \$810. In addition, 13.29 percent of homeowners and 7.74 percent of renters had home-related costs that exceeded 30.00 percent of their income.

Additionally, 18.69 percent of all owner occupied units and 27.79 percent of renter occupied units were located in LMI CTs. Further, 16.96 percent of all single family (1-4 unit) homes and 9.34 percent multifamily (5+ unit) housing units were located in LMI CTs.

### Competition

Banking competition is intense in this AA. According to FDIC information as of June 30, 2014, the five largest competitors include Branch Banking & Trust Company, The Conway NB, Wells Fargo Bank, N.A., Horry County State Bank, and Bank of America, N.A. According to the same FDIC information, WNB is ranked last out of 27 banks in the AA for market share of deposits with a 0.08 percent market share.

### Community Contact

To help identify needs and opportunities in the AA, our Community Affairs Officer interviewed a government community development organization in the MMSA. The Officer also interviewed a nonprofit economic development organization. The representative indicated that affordable housing is a challenge. The contact identified the following needs in the area: renovation or rehabilitation of homes, water sewer/sanitation improvement and cost, homeownership counseling and financial literacy, and reliable access to checking accounts.

The contact also indicated that there is an opportunity for financial institutions to offer first-time homebuyer programs and participate in down payment assistance programs.

## Washington-Arlington-Alexandria, DC-VA-MD-WV Metropolitan Statistical Area

### 2014 Washington-Arlington-Alexandria VA-MD MD

Demographic Information for Full Scope Area: 2014 Washington-Arlington-Alexandria VA-MD MD						
Demographic Characteristics	#	Low % of #	Moderate % of #	Middle % of #	Upper % of #	NA* % of #
Geographies (Census Tracts/BNAs)	829	5.55	22.92	37.88	32.69	0.97
Population by Geography	3,486,499	5.53	22.97	38.44	32.99	0.08
Owner-Occupied Housing by Geography	831,582	2.28	18.09	40.97	38.65	0.00
Business by Geography	318,520	2.94	16.78	39.91	40.20	0.16
Farms by Geography	5,267	2.01	18.89	41.28	37.74	0.08
Family Distribution by Income Level	822,550	18.99	17.49	21.70	41.82	0.00
Distribution of Low and Moderate Income Families throughout AA Geographies	300,053	9.87	35.54	38.39	16.18	0.02
Median Family Income FFIEC estimated MFI for 2014 Households Below Poverty Level		100,486 107,100 6%	Median Housing Value Unemployment Rate (2010 US Census)		420,448 3.01%	

(\*) The NA category consists of geographies that have not been assigned an income classification.  
Source: 2010 US Census and 2014 FFIEC estimated MFI

The composition of the Washington-Arlington-Alexandria DC-VA-MD-WV multi-state MSA is composed of two Metropolitan Divisions. Those Metropolitan Divisions include the Washington-Arlington-Alexandria Virginia (Washington AA) and Silver Spring-Frederick-Rockville Maryland. With the OMB changes in 2014, the Silver Springs became part of the Bethesda-Rockville-Frederick MD.

The bank's Washington AA encompasses the counties of Prince George in Maryland and Arlington, Clarke, Fairfax, Fauquier, Loudoun, Prince William, Spotsylvania, Stafford, and Warren counties in Virginia. The AA also includes the cities of Alexandria, Fairfax, Falls Church, Fredericksburg, Manassas and Manassas City in Virginia.

WNB operates eight of its nine banking offices in this AA. WNB had \$7 million in deposits based on June 30, 2014 FDIC information.

### Employment and Economic Factors

Based on 2014 information, the Washington-Arlington-Alexandria AA is the seventh largest metropolitan area in the nation, behind Philadelphia, Houston, Dallas, Chicago, Los Angeles and New York. The U.S. Bureau of Labor Statistics showed that the April 2015 unemployment rate for the MSA was 4.3 percent, which was lower than the unemployment rates of 4.5 percent for Virginia, 6.7 percent for the District of Columbia and 5.0 percent for Prince George county.

The largest employer in the MSA is the federal government followed by the public school system. These two employment sectors primarily drive the local economy and insulated the area during the recession from negative job growth.

Other strong employment clusters exist in government contracting, defense, information technology, biotechnology and telecommunications. With geography that ranges from world-class technology centers to historic cities and towns, the AA offers unparalleled for business. The Washington Business Journal stated that in June 2014, there were 15 Fortune 500 companies in the region.

### Housing

According to the 2010 Census for 2014 activity within the Washington DC MMSA, 63.05 percent of the housing units are owner occupied, 29.54 percent are renter occupied, and 7.41 percent of the housing units are vacant. The median housing value was \$420,448 and median monthly gross rent was \$1,365. In addition, 21.83 percent of homeowners and 13.02 percent of renters had home-related costs that exceeded 30.00 percent of their income.

Additionally, 20.77 percent of all owner occupied units and 47.60 percent of renter occupied units were located in LMI CTs. Further, 23.05 percent of all single family (1-4 unit) homes and 48.25 percent multifamily (5+ unit) housing units were located in LMI CTs.

### Competition

Banking competition is intense in this AA. According to FDIC information as of June 30, 2014, the five largest competitors include E\*TRADE Bank, Wells Fargo Bank, N.A., Bank of America, N.A., Capital One, N.A. and SunTrust Bank. According to the same FDIC information, WNB is ranked 56 out of 57 banks in the AA with a nominal deposit market share of 0.01 percent.

### Community Contact

To help identify needs and opportunities in the AA, our Community Affairs Officer interviewed housing council organizations in the MMSA. The Officer also interviewed a community development support organization.

The representative indicated a need to stabilize the neighborhoods by keeping the existing homeowners. There is a genuine need for financial literacy training and workforce development. The representative from the housing council identified the needs of the MMSA as affordable housing, healthcare and eldercare services. The representative indicated that affordable housing is an important need as the demand for rental housing outpaces supply. The representative identified opportunities for bank involvement in community development and credit- or housing-related projects.

## State of Texas

### Houston MSA

#### 2012 Houston-Sugar Land-Baytown TX MSA

Demographic Information for Full Scope Area: 2012 Houston-Sugar Land-Baytown TX MSA						
Demographic Characteristics	#	Low % of #	Moderate % of #	Middle % of #	Upper % of #	NA* % of #
Geographies (Census Tracts/BNAs)	1,063	12.32	28.60	27.00	31.61	0.47
Population by Geography	5,885,320	9.38	26.07	28.96	35.25	0.34
Owner-Occupied Housing by Geography	1,230,145	4.07	21.17	30.33	44.43	0.00
Business by Geography	576,337	8.12	20.12	25.20	46.51	0.06
Farms by Geography	10,567	4.50	19.07	34.86	41.55	0.01
Family Distribution by Income Level	1,383,653	23.75	16.55	17.56	42.14	0.00
Distribution of Low and Moderate Income Families throughout AA Geographies	557,556	16.91	38.30	27.83	16.96	0.00
Median Family Income FFIEC estimated MFI for 2012 Households Below Poverty Level		64,179 66.900 13%	Median Housing Value Unemployment Rate (2010 US Census)		155,666 3.40%	

(\*) The NA category consists of geographies that have not been assigned an income classification.  
Source: 2010 US Census and 2012 FFIEC estimated MFI

#### 2014 Houston-The Woodlands-Sugar Land TX MSA

Demographic Information for Full Scope Area: 2014 Houston-The Woodlands-Sugar Land TX MSA						
Demographic Characteristics	#	Low % of #	Moderate % of #	Middle % of #	Upper % of #	NA* % of #
Geographies (Census Tracts/BNAs)	1,063	12.32	28.60	27.00	31.61	0.47
Population by Geography	5,885,320	9.38	26.07	28.96	35.25	0.34
Owner-Occupied Housing by Geography	1,230,145	4.07	21.17	30.33	44.43	0.00
Business by Geography	496,895	8.09	19.82	25.08	46.93	0.07
Farms by Geography	8,961	4.56	18.28	34.08	43.06	0.01
Family Distribution by Income Level	1,383,653	23.75	16.55	17.56	42.14	0.00
Distribution of Low and Moderate Income Families throughout AA Geographies	557,556	16.91	38.30	27.83	16.96	0.00
Median Family Income FFIEC estimated MFI for 2014 Households Below Poverty Level		63,898 68,400 13%	Median Housing Value Unemployment Rate (2010 US Census)		155,666 3.40%	

(\*) The NA category consists of geographies that have not been assigned an income classification.  
Sources: 2010 US Census and 2014 FFIEC estimated MFI; 2014 Dunn and Bradstreet

The Houston-Sugar Land-Baytown MSA is located along the Gulf Coast region in the southeast portion of the state. The metropolitan area is colloquially referred to as "Greater Houston". In 2014, the MSA changed from the Houston-Sugar Land-Baytown MSA to the Houston-The Woodlands-Sugar Land Texas MSA AA (Houston AA).

This MSA is the fifth largest metropolitan area in the country with a population of 6.5 million according to the U. S. Census Bureau as of July 1, 2014. WNB had designated a portion of the MSA as its AA, including the following seven counties: Austin, Brazoria, Fort Bend, Galveston, Harris, Liberty and Montgomery. Chambers County was not included in the AA because there are no branches in the county. The bank has 105 branches in this AA with deposits of \$2.9 billion.

### Employment and Economic Factors

The 2014 FFIEC estimated MFI was \$68,400. About 23.75 percent of the families in the AA were low-income. Approximately 16.55 percent of the families were moderate-income.

The U.S. Bureau of Labor Statistics showed that the April 2015 unemployment rate for the AA was 4.0 percent, which equals the unemployment rate for the state of Texas.

The economy has a broad industrial base in the energy, aeronautics and technology industry. The city of Houston is known as the “Energy Capital of the World” and home to 26 Fortune 500 companies. Based on the 2014 census data, Houston is the county seat and largest city in Harris County. Houston is the fourth largest city in the US.

More than 3,700 businesses involved in the energy industry had a presence in the AA. Because of this high concentration of energy firms, movements in the price of oil and natural gas greatly affect the economy of the AA. The location of this AA on the Gulf of Mexico makes it a major core for international trade.

Other major industries that are headquartered in Houston include Sysco, Waste Management, Men’s Warehouse, Mattress Firm and American National Insurance. Other major companies such as United Airlines, and HP are not headquartered in Houston but maintain a major employment base. These industries are largely immune to events in the oil industry. Other important sectors to the economy include leisure, healthcare, education, construction and retail trade.

As of the 2012 Port Industry Statistics, the Port of Houston was the second largest port in the United States as measured by cargo volume and the largest U.S. port for international trade by volume. Three other large port facilities are in the region – the Port of Texas City, Port of Freeport, and the Port of Galveston, which were the twelfth, thirtieth and forty-sixth largest ports in the United States, respectively.

### Housing

According to the 2010 Census for the Houston AA, 55.83 percent of the housing units are owner occupied, 32.52 percent are renter occupied, and 11.65 percent of the housing units are vacant. The median housing value was \$155,666 and median monthly gross rent was \$853. The 2014 data also indicated that 15.43 percent of homeowners and 14.84 percent of renters had home-related costs that exceeded 30.00 percent of their income. Approximately 13.16 percent of all households in the AA had incomes below the poverty level, and 1.42 percent received public assistance.



Additionally, 25.24 percent of all owner occupied units and 51.54 percent of renter occupied units were located in LMI CTs. Further, 30.31 percent of all single family (1-4 unit) homes and 53.50 percent multifamily (5+ unit) housing units were located in LMI CTs.

In 2014, Local Market Monitor, LLC, and HomeVestors of America ranked the Houston AA second in the nation for residential real estate investment. Of residents who moved to the AA, between 2012 and 2013, 90 percent moved to Harris, Fort Bend and Montgomery counties. According to these articles, those counties coincided with the fastest-growing master-planned communities in the AA.

### Competition

The June 30, 2014 FDIC Market Share Report showed WNB was ranked 11 out of 102 financial institutions in the Houston MSA. WNB's deposit market share is 1.21 percent. The five major competitors in the AA are JPMorgan Chase Bank, N.A., Wells Fargo Bank S. Central, N.A., Wells Fargo Bank, N.A., Bank of America, N.A. and Compass Bank, which hold a combined 74.57 percent of the deposits in this market.

### Community Contact

In conjunction with this CRA evaluation, the Community Affairs Officer participated in a community roundtable for the Houston AA to identify the credit needs of the community and the opportunities financial institutions have to meet these needs.

The group focused on the need for affordable housing and public services. They specifically identified needs for workforce development and the rehabilitation or renovation of housing.

## San Antonio MSA

### 2012 San Antonio-New Braunfels TX MSA

Demographic Information for Full Scope Area: 2012 San Antonio-New Braunfels TX MSA						
Demographic Characteristics	#	Low % of #	Moderate % of #	Middle % of #	Upper % of #	NA* % of #
Geographies (Census Tracts/BNAs)	409	9.05	29.10	31.30	29.58	0.98
Population by Geography	1,925,722	7.12	29.35	32.79	30.74	0.00
Owner-Occupied Housing by Geography	416,969	4.79	24.08	34.59	36.54	0.00
Business by Geography	152,127	5.10	22.19	32.38	40.06	0.26
Farms by Geography	3,922	3.21	16.01	41.31	39.42	0.05
Family Distribution by Income Level	448,808	23.09	17.15	19.23	40.53	0.00
Distribution of Low and Moderate Income Families throughout AA Geographies	180,570	12.58	42.30	31.40	13.72	0.00
Median Family Income FFIEC estimated MFI for 2012 Households Below Poverty Level		58,222 60,800 15%	Median Housing Value Unemployment Rate (2010 US Census)		135,511 3.17%	

(\*) The NA category consists of geographies that have not been assigned an income classification.  
Source: 2010 US Census and 2012 FFIEC estimated MFI

### 2014 San Antonio-New Braunfels TX MSA

Demographic Information for Full Scope Area: 2014 San Antonio-New Braunfels TX MSA						
Demographic Characteristics	#	Low % of #	Moderate % of #	Middle % of #	Upper % of #	NA* % of #
Geographies (Census Tracts/BNAs)	409	9.05	29.10	31.30	29.58	0.98
Population by Geography	1,925,722	7.12	29.35	32.79	30.74	0.00
Owner-Occupied Housing by Geography	416,969	4.79	24.08	34.59	36.54	0.00
Business by Geography	133,719	5.18	22.03	32.09	40.44	0.27
Farms by Geography	3,406	3.29	15.88	40.69	40.08	0.06
Family Distribution by Income Level	448,808	23.09	17.15	19.23	40.53	0.00
Distribution of Low and Moderate Income Families throughout AA Geographies	180,570	12.58	42.30	31.40	13.72	0.00
Median Family Income FFIEC estimated MFI for 2014 Households Below Poverty Level		58,222 58,800 15%	Median Housing Value Unemployment Rate (2010 US Census)		135,511 3.17%	

(\*) The NA category consists of geographies that have not been assigned an income classification.  
Source: 2010 US Census and 2014 FFIEC estimated MFI

WNB had \$36 million in deposits in this AA as of June 30, 2014 according to FDIC information. The bank's San Antonio-New Braunfels TX MSA AA (San Antonio AA) encompasses the counties of Bexar, Guadalupe, Kendall and Medina. WNB operates 19 banking offices in the AA. These branches include the non-traditional in-store offices located in Wal-Mart stores.

## Employment and Economic Factors

The U.S. Bureau of Labor Statistics showed that the April 2015 unemployment rate for the AA was 3.4 percent, which was lower than the unemployment rate of 4.0 percent for Texas. The AA has a diversified economy, which is primarily focused on military, health care, government, financial services, oil and gas, and tourism.

Based on the 2013-2014 census estimates, San Antonio has a population of 1.4 million and is the seventh largest city in the United States. The San Antonio Economic Development Corporation claimed that the population grew by 6.6 percent since 2010 and has a growth projection of 6.34 percent through year 2020. Within the past 20 years, the city has become a significant base for call centers and automobile manufacturing.

## Housing

The 2014 FFIEC estimated MFI was \$58,800. About 23.09 percent of the families in the AA were low-income. Approximately 17.15 percent of the families were moderate-income.

According to the 2010 Census for 2014 activity within the AA, 57.84 percent of the housing units are owner occupied, 32.34 percent are renter occupied, and 9.82 percent of the housing units are vacant. The median housing value was \$135,511 and median monthly gross rent was \$779. In addition, 14.34 percent of homeowners and 14.47 percent of renters had home-related costs that exceeded 30.00 percent of their income. Approximately 15.33 percent of all households in the AA had incomes below the poverty level, and 1.77 percent received public assistance.

Additionally, 28.87 percent of all owner occupied units and 45.81 percent of renter occupied units were located in LMI CTs. Further, 34.62 percent of all single family (1-4 unit) homes and 42.62 percent multifamily (5+ unit) housing units were located in LMI CTs.

## Competition

Banking competition is intense in this AA. The June 30, 2014 FDIC Market Share Report, WNB is ranked 40 out of 53 financial institutions in the San Antonio AA. WNB's deposit market share is only 0.04 percent. The five major competitors in the AA are USAA FSB, Frost Bank, Wells Fargo Bank, N.A., Bank of America, N.A. and Broadway Bank.

## Community Contact

In conjunction with this CRA exam, the Community Affairs Officer interviewed a small business development organization in the San Antonio AA to identify the credit needs of the community and the opportunities financial institutions have to meet these needs. Along with the needs of small business owners for credit-related products, the representative identified a serious shortage of affordable housing in the AA. He also indicated that more capital loans for small businesses are needed to fund the growth and expansion of businesses.

**State of Alabama****Huntsville, AL MSA****2012 Huntsville AL MSA**

Demographic Information for Full Scope Area: 2012 Huntsville AL MSA						
Demographic Characteristics	#	Low % of #	Moderate % of #	Middle % of #	Upper % of #	NA* % of #
Geographies (Census Tracts/BNAs)	89	12.36	29.21	32.58	25.84	0.00
Population by Geography	417,593	8.34	25.71	36.81	29.14	0.00
Owner-Occupied Housing by Geography	112,302	3.59	23.58	39.46	33.38	0.00
Business by Geography	33,092	10.20	25.18	33.79	30.83	0.00
Farms by Geography	1,189	4.96	24.81	47.69	22.54	0.00
Family Distribution by Income Level	105,658	22.84	16.80	18.52	41.84	0.00
Distribution of Low and Moderate Income Families throughout AA Geographies	41,883	13.38	36.83	36.14	13.65	0.00
Median Family Income FFIEC estimated MFI for 2012 Households Below Poverty Level		67,829 71,700 12%	Median Housing Value Unemployment Rate (2010 US Census)		147,330 3.92%	

(\*) The NA category consists of geographies that have not been assigned an income classification.  
Source: 2010 US Census and 2012 FFIEC estimated MFI

**2014 Huntsville AL MSA**

Demographic Information for Full Scope Area: 2014 Huntsville AL MSA						
Demographic Characteristics	#	Low % of #	Moderate % of #	Middle % of #	Upper % of #	NA* % of #
Geographies (Census Tracts/BNAs)	89	12.36	29.21	32.58	25.84	0.00
Population by Geography	417,593	8.34	25.71	36.81	29.14	0.00
Owner-Occupied Housing by Geography	112,302	3.59	23.58	39.46	33.38	0.00
Business by Geography	28,889	10.11	25.20	33.92	30.77	0.00
Farms by Geography	1,041	4.71	24.50	48.80	22.00	0.00
Family Distribution by Income Level	105,658	22.84	16.80	18.52	41.84	0.00
Distribution of Low and Moderate Income Families throughout AA Geographies	41,883	13.38	36.83	36.14	13.65	0.00
Median Family Income FFIEC estimated MFI for 2014 Households Below Poverty Level		67,829 69,700 12%	Median Housing Value Unemployment Rate (2010 US Census)		147,330 3.92%	

(\*) The NA category consists of geographies that have not been assigned an income classification.  
Source: 2010 US Census and 2014 FFEIC estimated MFI

The Huntsville, AL MSA is the second largest MSA by population in the state of Alabama according to the U.S. Census Bureau. The MSA includes Limestone and Madison Counties. WNB had designated the entire MSA as its AA.

WNB operates six banking offices in the Huntsville AA. These branches are all non-traditional in-store offices located in Wal-Mart stores. WNB had \$3 million in deposits in this AA based on June 30, 2014 FDIC information.

### Employment and Economic Factors

The U.S. Bureau of Labor Statistics showed that the April 2015 unemployment rate for the MSA was 4.8 percent, which was lower than the unemployment rate of 5.3 percent for Alabama.

Based on information provided through AL.com, the area has the country's leading technology centers, which attributes to continued employment and income growth in technological related fields. The AA compares favorably to its metro peers and has the highest per capita concentration of engineers of any community in the country. The primary industries are defense, aerospace, life sciences, information technology and manufacturing.

The Alabama Department of Labor announced in 2013 that the federal government shutdown impacted many jobs. In June 2014, Navistar International Corporation transferred its mid-range engine production from Huntsville to Melrose Park, IL, resulting in a loss of 280 local jobs.

### Housing

According to the 2010 Census for 2014 activity within the AA, 64.20 percent of the housing units are owner occupied, 25.32 percent are renter occupied, and 10.49 percent of the housing units are vacant. The median housing value was \$147,330 and median monthly gross rent was \$658. In addition, 11.22 percent of homeowners and 10.34 percent of renters had home-related costs that exceeded 30.00 percent of their income.

Additionally, 27.17 percent of all owner occupied units and 56.76 percent of renter occupied units were located in LMI CTs. Further, 32.43 percent of all single family (1-4 unit) homes and 58.38 percent multifamily (5+ unit) housing units were located in LMI CTs.

### Competition

Banking competition is intense in the Charlotte AA. According to FDIC information as of June 30, 2014, the five largest competitors include Regions Bank, Compass Bank, ServisFirst Bank, Wells Fargo Bank, N.A., and Branch Banking & Trust Company. According to the same FDIC information, WNB is ranked last of 27 banks in the Huntsville AA for market share of deposits with a 0.09 percent market share.

### Community Contact

In conjunction with this CRA exam, the Community Affairs Officer interviewed an affordable housing organization in the Huntsville AA to identify the credit needs of the community and the opportunities financial institutions have to meet these needs. The representative identified affordable housing, including the renovation or rehabilitation, as a need in the AA.

Also, there are opportunities for financial institutions to finance the construction or improvement of homes; provide financial education for LMI individuals; and offer grants and donations to support community development activities in the area.

## State of Florida

### Jacksonville, FL MSA

#### 2012 Jacksonville FL MSA

Demographic Information for Full Scope Area: 2012 Jacksonville FL MSA						
Demographic Characteristics	#	Low % of #	Moderate % of #	Middle % of #	Upper % of #	NA* % of #
Geographies (Census Tracts/BNAs)	173	9.83	28.32	37.57	24.28	0.00
Population by Geography	864,263	7.14	24.63	40.55	27.68	0.00
Owner-Occupied Housing by Geography	208,357	4.76	20.61	42.35	32.28	0.00
Business by Geography	118,840	5.32	25.34	37.18	32.16	0.00
Farms by Geography	2,501	4.96	20.75	43.54	30.75	0.00
Family Distribution by Income Level	208,156	23.20	18.23	21.81	36.76	0.00
Distribution of Low and Moderate Income Families throughout AA Geographies	86,246	11.83	34.14	39.67	14.36	0.00
Median Family Income FFIEC estimated MFI for 2012 Households Below Poverty Level		63,927 67,300 13%	Median Housing Value Unemployment Rate (2010 US Census)		187,499 4.51%	

(\*) The NA category consists of geographies that have not been assigned an income classification.  
Source: 2010 US Census and 2012 FFIEC estimated MFI

#### 2014 Jacksonville FL MSA

Demographic Information for Full Scope Area: 2014 Jacksonville FL MSA						
Demographic Characteristics	#	Low % of #	Moderate % of #	Middle % of #	Upper % of #	NA* % of #
Geographies (Census Tracts/BNAs)	173	9.83	28.32	37.57	24.28	0.00
Population by Geography	864,263	7.14	24.63	40.55	27.68	0.00
Owner-Occupied Housing by Geography	208,357	4.76	20.61	42.35	32.28	0.00
Business by Geography	98,586	5.10	24.91	37.45	32.55	0.00
Farms by Geography	2,106	4.46	20.28	44.30	30.96	0.00
Family Distribution by Income Level	208,156	23.20	18.23	21.81	36.76	0.00
Distribution of Low and Moderate Income Families throughout AA Geographies	86,246	11.83	34.14	39.67	14.36	0.00
Median Family Income FFIEC estimated MFI for 2014 Households Below Poverty Level		63,927 63,200 13%	Median Housing Value Unemployment Rate (2010 US Census)		187,499 4.51%	

(\*) The NA category consists of geographies that have not been assigned an income classification.  
Source: 2010 US Census and 2014 FFIEC estimated MFI

The Jacksonville, FL MSA is the fourth largest MSA by population in the state of Florida according to the U.S. Census Bureau as of 2013. The Jacksonville FL MSA includes Baker, Clay, Duval, Nassau, and St. Johns Counties, but WNB has designated Duval County as its Jacksonville AA.

WNB operates three banking offices in the AA. These branches are all non-traditional in-store offices located in Wal-Mart stores. WNB had \$758,000 in deposits in this AA based on June 30, 2014 FDIC information.

### Employment and Economic Factors

The U.S. Bureau of Labor Statistics showed that the April 2015 unemployment rate in the AA was 5.2 percent, which is less than the unemployment rate of 5.3 percent for the state of Florida.

Common-Wealth.org stated that municipal enterprises are especially important to Jacksonville's economy. JEA aka Jacksonville Electric Authority is the seventh largest municipally owned electric utility in the country and largest in the state. The Port of Jacksonville is also an important economic engine for the city. A 2009 study estimated that 65,000 jobs in Northeast Florida are related to port authority and that the port generates nearly \$19 billion in economic impact annually. Furthermore, the Port Authority committed to support regional development by implementing a Small and Emerging Business Program, which includes a focus on minority suppliers.

Jacksonville.about.com lists the significant employers as the Naval Air Station Jacksonville, Duval County Public Schools, Naval Station Mayport, City of Jacksonville, and Baptist Health. The Economic Development Report for Florida as of 2014 lists Duval County top industries as trade, transportation and utilities, professional and business services, education and health services, government; and leisure and hospitality.

Jacksonville.com reported in February 2015 that more than a third of the 6,085 workers from all industries have been laid off because of financial institutions' layoffs. However, the overall AA has gained jobs in the finance and insurance industry. In the second quarter of 2014, there was a 6 percent increase since 2010.

In June 2015, Governor Rick Scott announced that Apex Technology added jobs in the last 12 months and plans to add 60 more over the next four years. The expansion of Apex Technology to the area is a great addition to Florida's manufacturing industry. Florida ranks among the top 10 states for manufacturing establishments, due to strong workforce and low tax climate. The reduction of taxes on companies encourages growth and expansion.

### Housing

According to the 2010 Census for 2014 activity within the Jacksonville AA, 54.32 percent of the housing units are owner occupied, 31.79 percent are renter occupied, and 13.89 percent of the housing units are vacant. The median housing value was \$187,499 and median monthly gross rent was \$881. In addition, 17.41 percent of homeowners and 15.55 percent of renters had home-related costs that exceeded 30.00 percent of their income.

Additionally, 25.37 percent of all owner occupied units and 45.32 percent of renter occupied units were located in LMI CTs. Further, 31.92 percent of all single family (1-4 unit) homes and 42.45 percent multifamily (5+ unit) housing units were located in LMI CTs.



### Competition

Banking competition is intense in the AA. According to FDIC information as of June 30, 2014, the five largest competitors include Bank of America, N.A., Everbank, Wells Fargo Bank, N.A., Compass Bank and SunTrust Bank. According to the same FDIC information, WNB is ranked 27 out of 29 banks in the Jacksonville AA with a deposit market share of 0.00 percent.

### Community Contact

In conjunction with this CRA exam, the Community Affairs Officer interviewed an affordable housing organization in the Jacksonville AA to identify the credit needs of the community and the opportunities financial institutions have to meet these needs. The contact identified financial education and home improvement as a need for the LMI population. There is also an opportunity for financial institutions to offer flexible underwriting to potential homeowners, participate in financial education, assist in small business development and finance rental housing.

## State of Georgia

### Atlanta MSA

#### 2012 Atlanta-Sandy Springs-Marietta GA MSA

Demographic Information for Full Scope Area: 2012 Atlanta-Sandy Springs-Marietta GA MSA						
Demographic Characteristics	#	Low % of #	Moderate % of #	Middle % of #	Upper % of #	NA* % of #
Geographies (Census Tracts/BNAs)	547	15.54	26.33	27.42	29.80	0.91
Population by Geography	2,888,304	10.27	25.56	32.52	31.45	0.20
Owner-Occupied Housing by Geography	649,753	4.91	20.30	35.64	39.15	0.00
Business by Geography	385,767	7.27	21.49	30.90	40.22	0.12
Farms by Geography	5,152	6.09	20.07	39.03	34.78	0.02
Family Distribution by Income Level	666,999	23.73	16.98	18.42	40.88	0.00
Distribution of Low and Moderate Income Families throughout AA Geographies	271,520	17.69	35.95	30.76	15.60	0.00
Median Family Income FFIEC estimated MFI for 2012 Households Below Poverty Level		67,374 82,300 12%	Median Housing Value Unemployment Rate (2010 US Census)		225,024 5.05%	

(\*) The NA category consists of geographies that have not been assigned an income classification.  
Source: 2010 US Census and 2012 FFIEC estimated MFI

#### 2014 Atlanta-Sandy Springs-Roswell GA MSA

Demographic Information for Full Scope Area: 2014 Atlanta-Sandy Springs-Roswell GA MSA						
Demographic Characteristics	#	Low % of #	Moderate % of #	Middle % of #	Upper % of #	NA* % of #
Geographies (Census Tracts/BNAs)	567	14.99	25.40	27.34	31.39	0.88
Population by Geography	2,994,871	9.90	24.65	32.28	32.98	0.19
Owner-Occupied Housing by Geography	681,586	4.68	19.35	35.19	40.78	0.00
Business by Geography	327,189	6.61	20.43	30.64	42.19	0.12
Farms by Geography	4,688	5.42	18.69	38.87	36.97	0.06
Family Distribution by Income Level	696,838	23.17	16.83	18.36	41.65	0.00
Distribution of Low and Moderate Income Families throughout AA Geographies	278,685	17.24	35.02	30.87	16.87	0.00
Median Family Income FFIEC estimated MFI for 2014 Households Below Poverty Level		67,374 70,100 12%	Median Housing Value Unemployment Rate (2010 US Census)		226,387 4.97%	

(\*) The NA category consists of geographies that have not been assigned an income classification.  
Source: 2010 US Census and 2014 FFIEC estimated MFI

The 2012-2013 Atlanta-Sandy Springs-Marietta, GA MSA changed to Atlanta-Sandy Springs-Roswell, GA MSA (Atlanta AA). The AA changed because of the OMB 2014 new designations. The AA includes Clayton, Coweta, DeKalb, Fulton, Gwinnett, and Walton counties. The Atlanta AA operates eight banking offices.

These branches are all non-traditional in-store offices located in Wal-Mart stores. WNB had \$4 million in deposits in this AA at June 30, 2014 according to FDIC information.

### Employment and Economic Factors

The Atlanta AA is the ninth largest by population in the United States based on U.S. Census Bureau information as of July 1, 2014. According to the April 2015 Bureau of Labor Statistics, the Atlanta AA had an unemployment rate of 5.6 percent, which is lower than unemployment rate of 5.8 percent for Georgia.

Clayton Economic Development stated that the major employers are Clayton County Public Schools, Delta Tech Ops, Southern Regional Medical Center, Fresh Express, Inc. and FedEx Ground. Clayton County is home to Hartsfield-Jackson Atlanta International Airport, which is one of the busiest passenger airports in the U. S. and has the second largest airline, Delta Airlines. Nearly 40,000 employees or 35 percent of the workforce work in supply chain and logistics jobs because of the close proximity to the airport. Station WXIA announced in November 2014, the approval by Clayton County residents to expand MARTA rail system to the area. The service is to be completed by July 2016.

According to Coweta County government information, film and television production crews have boosted the local economy. Georgia Department of Labor (DOL) stated that the major employers include Cancer Treatment Centers of America, Cargill Meat Solutions, HOV Services, Intercall, PetSmart and Piedmont Newnan Hospital.

The Georgian DOL stated that the major employers in DeKalb County are AT&T Services, Children's Healthcare of Atlanta, DeKalb Medical Center, Emory Healthcare and Emory University. The state's DOL for Fulton stated the major employers are AT&T Services, Delta Air Lines, GA Institute of Technology, GA State University and Grady Health Systems. The department listed the major employers of Gwinnett County as Acumen Fiscal Agent, American Security Group, Cisco Systems, Gwinnett Hospital System, and NCR Corporation. The department listed the major employers of Walton County as Apollo Staffing, Debbie's Staffing Services, Elite Storage Solutions, Hitachi Automotive Products, Leggett & Platt, and Pike Electric.

The Atlanta Business Chronicle and FOX News announced job growth for Atlanta. The Chronicle stated that employment growth in the first quarter of 2015 was 2.9 percent. The expected job growth rate for 2015 is 3.4 percent. Local corporate firms, Kaiser Permanente (KP) and Comcast, announced job growth to fill the construction of their nine-story tower near the Braves Stadium. KP also announced 900 information technology jobs for its new technology center in Midtown by 2017. The information and technology sector should see an increase in job announcements from Amazon, PureCars, Mobinteg, Cisco, Amtrak, Southern Company and Applied Systems.

Further impact to the AA include the announcement by Motorworks in January 2015 that Mercedes-Benz is relocating its corporate headquarters to Atlanta and will complete its new building by early 2017. In June 2015, Governor Nathan Deal announced the relocation of Courion's international headquarters to a new center in Roswell with the creation of 100 jobs over the next two years.

On the other hand, Business Journal, USA Today and WSB-TV announced layoffs in 2014 and 2015 by such companies as Macy's, STS, Verizon Wireless, General Electric Power and Water, Nordstrom, J.C. Penney and Coca-Cola.

### Housing

According the 2010 Census for 2014, activity within the Atlanta AA, 54.81 percent of the housing units are owner occupied, 32.05 percent are renter occupied, and 13.13 percent of the housing units are vacant. According to the Census, the median housing value was \$226,387 and median monthly gross rent was \$927. In addition, 18.55 percent of homeowners and 15.84 percent of renters had home-related costs that exceeded 30.00 percent of their income.

Additionally, 24.03 percent of all owner occupied units and 52.65 percent of renter occupied units were located in LMI CTs. Further, 30.70 percent of all single family (1-4 unit) homes and 52.61 percent multifamily (5+ unit) housing units were located in LMI CTs.

### Competition

Banking competition is intense in this AA. According to FDIC information as of June 30, 2014, the five largest competitors include SunTrust Bank, Wells Fargo Bank, N.A., Bank of America, N.A., Branch Banking & Trust Company, and Synovus Bank. According to the same FDIC information, WNB is ranked 64 out of 69 banks in the AA for market share of deposits with a 0.00 percent deposit market share.

### Community Contact

To help identify needs and opportunities, our Community Affairs Officer interviewed an economic development organization in the MSA. In addition, the Officer interviewed a nonprofit enterprise business corporation in the area. The representative indicated that there is a need for local lending, especially to small businesses, and identified small business financing as an opportunity for financial institutions in the AA. Also, the nonprofit indicated that lines of credit are a prominent credit need for small businesses in the area.

## State of Illinois

### Northern Non-MSA IL MSA

#### 2012 Northern Non-MSA IL

Demographic Information for Full Scope Area: 2012 Northern Non-MSA IL						
Demographic Characteristics	#	Low % of #	Moderate % of #	Middle % of #	Upper % of #	NA* % of #
Geographies (Census Tracts/BNAs)	89	1.12	7.87	65.17	25.84	0.00
Population by Geography	348,611	0.55	6.51	66.59	26.36	0.00
Owner-Occupied Housing by Geography	103,610	0.44	5.52	66.49	27.56	0.00
Business by Geography	22,722	0.51	7.71	66.40	25.37	0.00
Farms by Geography	3,598	0.11	1.36	70.90	27.63	0.00
Family Distribution by Income Level	93,554	16.06	16.41	22.67	44.86	0.00
Distribution of Low and Moderate Income Families throughout AA Geographies	30,377	1.23	10.72	68.17	19.87	0.00
Median Family Income FFIEC estimated MFI for 2012 Households Below Poverty Level		54,499 57,400 11%	Median Housing Value Unemployment Rate (2010 US Census)		120,685 4.45%	

(\*) The NA category consists of geographies that have not been assigned an income classification.  
Source: 2010 US Census and 2012 FFIEC estimated MFI

#### 2014 Northern Non-MSA IL

Demographic Information for Full Scope Area: 2014 Northern Non-MSA IL						
Demographic Characteristics	#	Low % of #	Moderate % of #	Middle % of #	Upper % of #	NA* % of #
Geographies (Census Tracts/BNAs)	89	1.12	7.87	65.17	25.84	0.00
Population by Geography	348,611	0.55	6.51	66.59	26.36	0.00
Owner-Occupied Housing by Geography	103,610	0.44	5.52	66.49	27.56	0.00
Business by Geography	19,762	0.53	7.81	66.27	25.39	0.00
Farms by Geography	3,169	0.09	1.36	71.03	27.52	0.00
Family Distribution by Income Level	93,554	16.06	16.41	22.67	44.86	0.00
Distribution of Low and Moderate Income Families throughout AA Geographies	30,377	1.23	10.72	68.17	19.87	0.00
Median Family Income FFIEC estimated MFI for 2014 Households Below Poverty Level		54,499 58,600 11%	Median Housing Value Unemployment Rate (2010 US Census)		120,685 4.45%	

(\*) The NA category consists of geographies that have not been assigned an income classification.  
Source: 2010 US Census and 2014 FFIEC estimated MFI

The Northern Illinois Non-MSA AA (N IL AA) includes La Salle, Lee, Livingston, Ogle, Stephenson and Whiteside counties, which are primarily rural.

WNB operates five banking offices in the AA. There are no branches in the county of Ogle. These branches are all non-traditional in-store offices located in Wal-Mart stores. WNB had \$4 million in deposits in this AA as of June 30, 2014 according to the FDIC.

### Employment and Economic Factors

The U.S. Bureau of Labor Statistics showed that the April 2015 unemployment rates in the AA were 4.2 percent for Livingston, 4.5 percent for Lee, 5.2 percent for Whiteside, 5.5 percent for Ogle, 5.8 percent for Stephenson, and 5.9 percent for LaSalle counties. The county unemployment rates varied when compared to the unemployment rate of 5.5 percent for the state of Illinois.

Wikipedia.org information on LaSalle County stated many of the smaller townships and villages are driven by farming while the larger cities of Ottawa and Streator define the retail and service aspect. Illinois Milk Producer's Association noted that Stephenson County is the largest dairy producing county in IL.

The Economic Development Councils for the counties noted that the major employers are Public Schools, Commonwealth Edison and J.C. Whitney for LaSalle; Wal-Mart, CHC Medical, and KSB Hospital for Lee; Caterpillar, Inc., Pontiac Correctional Center, and OSF St. James/J.W. Albrecht Medical Center for Livingston; FHN, Honeywell Sensing and Control, and Titan Good Year Farm Tires for Stephenson; and CGH Hospital, Wal-Mart Distribution Center and Wahl Clipper-Manufacturing for Whiteside.

### Housing

According to the 2010 Census for 2014, activity within the N IL AA, 68.71 percent of the housing units are owner occupied, 22.54 percent are renter occupied, and 8.75 percent of the housing units are vacant. The median housing value was \$120,685 and median monthly gross rent was \$611. In addition, 16.23 percent of homeowners and 8.70 percent of renters had home-related costs that exceeded 30.00 percent of their income.

Additionally, 5.96 percent of all owner occupied units and 12.27 percent of renter occupied units were located in LMI CTs. Further, 7.19 percent of all single family (1-4 unit) homes and 11.88 percent multifamily (5+ unit) housing units were located in LMI CTs.

### Competition

Banking competition is intense in the AA. According to FDIC information as of June 30, 2014, the five largest competitors include First State Bank, Midland States Bank, Bank of Pontiac, Sterling Federal Bank, F.S.B., and Eureka Savings Bank. According to the same FDIC information, WNB is ranked last of 69 banks in the N IL AA for market share of deposits with a 0.05 percent market share.

Community Contact

In conjunction with the CRA examination for this institution, the Community Affairs Officer interviewed two community developments and one governmental organization in the AA to identify the credit needs of the community and the opportunities financial institutions have to meet these needs. The representatives identified the following needs in the AA: housing for LMI individuals, senior living facilities and working capital credit. The representatives indicated that financial institutions have an opportunity to participate in community development activities in the AA.

## State of Indiana

### Southern IN Non-MSA

#### 2012 Indiana Southern Non-MSA IN

Demographic Information for Full Scope Area: 2012 Southern Non-MSA IN						
Demographic Characteristics	#	Low % of #	Moderate % of #	Middle % of #	Upper % of #	NA* % of #
Geographies (Census Tracts/BNAs)	56	0.00	17.86	66.07	16.07	0.00
Population by Geography	243,004	0.00	14.47	65.49	20.04	0.00
Owner-Occupied Housing by Geography	72,654	0.00	10.34	67.75	21.91	0.00
Business by Geography	18,026	0.00	15.24	62.04	22.72	0.00
Farms by Geography	2,145	0.00	3.12	68.39	28.48	0.00
Family Distribution by Income Level	65,685	17.50	19.41	22.88	40.20	0.00
Distribution of Low and Moderate Income Families throughout AA Geographies	24,246	0.00	19.09	67.68	13.23	0.00
Median Family Income FFIEC estimated MFI for 2012 Households Below Poverty Level		53,037 53,600 13%	Median Housing Value Unemployment Rate (2010 US Census)	102,548 3.48%		

(\*) The NA category consists of geographies that have not been assigned an income classification.  
Source: 2010 US Census and 2012 FFIEC estimated MFI

#### 2014 Indiana Southern Non-MSA IN

Demographic Information for Full Scope Area: 2014 Southern Non-MSA IN						
Demographic Characteristics	#	Low % of #	Moderate % of #	Middle % of #	Upper % of #	NA* % of #
Geographies (Census Tracts/BNAs)	63	0.00	15.87	66.67	17.46	0.00
Population by Geography	276,507	0.00	12.72	65.16	22.12	0.00
Owner-Occupied Housing by Geography	82,755	0.00	9.08	66.87	24.06	0.00
Business by Geography	17,335	0.00	13.39	61.56	25.05	0.00
Farms by Geography	2,183	0.00	2.38	65.96	31.65	0.00
Family Distribution by Income Level	74,202	17.22	18.93	22.66	41.19	0.00
Distribution of Low and Moderate Income Families throughout AA Geographies	26,821	0.00	17.26	68.30	14.44	0.00
Median Family Income FFIEC estimated MFI for 2014 Households Below Poverty Level		53,037 56,100 13%	Median Housing Value Unemployment Rate (2010 US Census)	102,248 3.46%		

(\*) The NA category consists of geographies that have not been assigned an income classification.  
Source: 2010 US Census and 2014 FFEIC estimated MFI

The Southern Indiana Non-Metropolitan Statistical Area AA (S IN AA) is a rural area in the southern half of Indiana. The AA is comprised of nine counties – Daviess, Dubois, Gibson, Jackson, Knox, Lawrence, Martin, Perry, and Pike counties. In 2014, the S IN Non-MSA now includes Gibson County, which was removed from the Evansville, IN-KY MSA.



WNB operates seven banking offices in the S IN AA. These branches are all non-traditional in-store offices located in Wal-Mart stores. There are no branches in the counties of Martin and Pike. June 30, 2014 FDIC information reflects that the bank had \$5 million in deposits in this AA.

### Employment and Economic Factors

According to the U.S. Bureau of Labor Statistics in April 2015, the unemployment rate for S IN AA was 2.9 percent in Dubois County, 3.3 percent in Daviess County, 3.5 percent in Gibson County, 3.8 percent in Jackson County, 4.0 percent in Knox County, 4.3 percent in Perry County, and 6.1 percent in Lawrence County. When comparing these rates to the Indiana state unemployment rate of 4.6 percent, the majority of the counties have lower unemployment rates than the state.

Local economic development councils and Hoosiers by the Numbers list the top employers for the counties as the following: Daviess, Daviess Community Hospital, Perdue Foods, Wal-Mart Supercenter and Dubois.

The U.S. Department of Labor reports the economy is stable but fairly stagnant and is driven by manufacturing, coal mining, military/government, agriculture, and an emerging oil industry. Manufacturing is the leading industry. The strengths are wood and cabinetry manufacturing in Dubois, limestone manufacturing and quarry mining in Lawrence, and transportation and logistics distribution via railway in Jackson.

In August 2014, Five Star Mining announced the closure of its mining operations in Pike County. As one of the county's largest employers, the closure affected almost 1,000 jobs. Vectren Fuels and Sunrise Coal LLC have finalized the purchase and plan to absorb as many operational staff as possible.

Also in August, Knox County Development Corporation announced continued growth in the industrial base and highlighted growth in small business. About 80 percent of the businesses employ 20 people or less. Knox County Development Corporation wants to promote small businesses and keep the economic base stable and thriving.

### Housing

According to the 2010 Census for 2014, activity within the S IN AA, 69.05 percent of the housing units are owner occupied, 20.48 percent are renter occupied, and 10.47 percent of the housing units are vacant. The median housing value was \$102,248 and median monthly gross rent was \$579. In addition, 13.37 percent of homeowners and 7.66 percent of renters had home-related costs that exceeded 30.00 percent of their income.

According to the demographic data, there were no low-income census tracts in the AA. In the moderate CTs, 9.08 percent of the units are owner occupied units and 22.36 percent of the units are renter occupied units. Further, 12.15 percent of all single family (1-4 unit) homes and 10.99 percent multifamily (5+ unit) housing units were located in LMI CTs.

### Competition

Based on the June 30, 2014 FDIC Deposit Market Share Report, competition is intense. WNB ranks last out of 26 financial institutions in the AA with a deposit market share of 0.11 percent. The five major competitors in the AA include German American Bancorp, Old National Bank, Fifth Third Bank, Jackson County Bank and Regions Bank.

### Community Contact

In conjunction with this CRA exam, our Community Affairs Officer contacted a local nonprofit organization to determine the credit needs of the communities and the opportunities for banks to meet those needs. The contact noted the need for additional government housing. According to this contact, opportunities exist for mortgage assistance in the form of debt consolidation. The Officer also contacted a local economic development agency and this representative indicated a need for more affordable housing and small business loans.

## State of Kentucky

### Lexington-Fayette, KY MSA

#### 2012 Lexington-Fayette KY MSA

Demographic Information for Full Scope Area: 2012 Lexington-Fayette KY MSA						
Demographic Characteristics	#	Low % of #	Moderate % of #	Middle % of #	Upper % of #	NA* % of #
Geographies (Census Tracts/BNAs)	101	11.88	24.75	32.67	30.69	0.00
Population by Geography	380,002	10.72	26.07	33.70	29.50	0.00
Owner-Occupied Housing by Geography	89,788	5.01	21.09	37.40	36.50	0.00
Business by Geography	37,305	7.80	22.91	35.66	33.63	0.00
Farms by Geography	1,539	4.09	14.81	41.07	40.03	0.00
Family Distribution by Income Level	93,248	23.47	16.08	20.19	40.26	0.00
Distribution of Low and Moderate Income Families throughout AA Geographies	36,879	14.04	37.38	33.86	14.72	0.00
Median Family Income FFIEC estimated MFI for 2012 Households Below Poverty Level		63,242 67,100 16%	Median Housing Value Unemployment Rate (2010 US Census)		170,853 3.56%	

(\*) The NA category consists of geographies that have not been assigned an income classification.  
Source: 2010 US Census and 2012 FFIEC estimated MFI

#### 2014 Lexington-Fayette KY MSA

Demographic Information for Full Scope Area: 2014 Lexington-Fayette KY MSA						
Demographic Characteristics	#	Low % of #	Moderate % of #	Middle % of #	Upper % of #	NA* % of #
Geographies (Census Tracts/BNAs)	101	11.88	24.75	32.67	30.69	0.00
Population by Geography	380,002	10.72	26.07	33.70	29.50	0.00
Owner-Occupied Housing by Geography	89,788	5.01	21.09	37.40	36.50	0.00
Business by Geography	31,567	8.27	23.18	35.88	32.67	0.00
Farms by Geography	1,338	5.01	13.68	41.63	39.69	0.00
Family Distribution by Income Level	93,248	23.47	16.08	20.19	40.26	0.00
Distribution of Low and Moderate Income Families throughout AA Geographies	36,879	14.04	37.38	33.86	14.72	0.00
Median Family Income FFIEC estimated MFI for 2014 Households Below Poverty Level		63,242 67,800 16%	Median Housing Value Unemployment Rate (2010 US Census)		170,853 3.56%	

(\*) The NA category consists of geographies that have not been assigned an income classification.  
Source: 2010 US Census and 2014 FFIEC estimated MFI

The Lexington-Fayette, KY MSA AA (Lexington AA) is the second largest MSA by population in the state of Kentucky according to the U.S. Census Bureau. The MSA includes six counties, but the WNB has designated Clark, Fayette, and Jessamine counties as its AA.

WNB operates four banking offices in the AA. These branches are all non-traditional in-store offices located in Wal-Mart stores. WNB had \$2 million in deposits in this AA at June 30, 2014 according to FDIC information.

### Employment and Economic Factors

The U.S. Bureau of Labor Statistics showed that the April 2015 unemployment rate in the AA was 3.8 percent, which was lower than the unemployment rate of 4.8 percent for the state of Kentucky. Banking competition is moderate in the AA.

The Greater Lexington Chamber of Commerce, Inc., in 2014 stated that despite the solid base of manufacturing and automotive suppliers, the Bluegrass Region is mainly a service-based economy. Manufacturing is one of the larger employers. Especially strong are the areas of health care and education. The service sector continues to be the main economic engine for the region. The Bluegrass Region's economy has consistent, sustainable growth. The region is a diversified growth engine for health and educational services, government, retail trade, manufacturing and construction.

According to Commerce Lexington Economic Development for 2014, the significant employers in Fayette County are the University of Kentucky, Fayette County public schools and Kentucky One Health. In Clark County, the major employers are Caralent Pharma Solutions, Leggett & Platt, Inc., and Freeman Corporation. In Jessamine County, the major employers are McLane Cumberland, Altech and McKechnie Vehicle.

### Housing

According to the 2010 Census for 2014 activity within the Lexington AA, 53.62 percent of the housing units are owner occupied, 37.71 percent are renter occupied, and 8.68 percent of the housing units are vacant. According to the Census, the median housing value was \$170,853 and the median monthly gross rent was \$689. In addition, 12.08 percent of homeowners and 16.76 percent of renters had home-related costs that exceeded 30.00 percent of their income.

Additionally, 26.10 percent of all owner occupied units and 52.92 percent of renter occupied units were located in LMI CTs. Further, 32.84 percent of all single family (1-4 unit) homes and 56.48 percent multifamily (5+ unit) housing units were located in LMI CTs.

### Competition

According to FDIC information as of June 30, 2014, the five largest competitors include Central Bank & Trust Co., JPMorgan Chase Bank, N.A., Fifth Third Bank, PNC Bank, N.A., and Traditional Bank, Inc. According to the same FDIC information, WNB is ranked 31 out of 32 banks in the AA for market share of deposits with a 0.03 percent market share.

### Community Contact

To help identify needs and opportunities in the AA, the Community Affairs Officer interviewed two contacts in the Lexington AA; one was a municipal economic development organization and the other contact was a realtor.

The representatives identified financial education for first time homebuyers, affordable rental units, loans for first time homebuyers, and down payment assistance as the most pressing needs in the AA.

## State of Louisiana

### Southern Non-MSA, LA MSA (Southern LA AA)

#### 2012 Southern Non-MSA LA

Demographic Information for Full Scope Area: 2012 Southern Non-MSA LA						
Demographic Characteristics	#	Low % of #	Moderate % of #	Middle % of #	Upper % of #	NA* % of #
Geographies (Census Tracts/BNAs)	46	4.35	32.61	34.78	28.26	0.00
Population by Geography	210,735	4.19	32.61	32.70	30.50	0.00
Owner-Occupied Housing by Geography	54,208	2.78	28.51	35.34	33.37	0.00
Business by Geography	22,092	3.80	35.38	31.55	29.26	0.00
Farms by Geography	1,233	0.49	21.41	38.20	39.90	0.00
Family Distribution by Income Level	53,918	27.12	15.62	17.22	40.04	0.00
Distribution of Low and Moderate Income Families throughout AA Geographies	23,044	5.80	42.30	30.59	21.31	0.00
Median Family Income FFIEC estimated MFI for 2012 Households Below Poverty Level		47,051 47,000 24%	Median Housing Value Unemployment Rate (2010 US Census)		84,580 2.80%	

(\*) The NA category consists of geographies that have not been assigned an income classification.  
Source: 2010 US Census and 2012 FFIEC estimated MFI

#### 2014 Southern Non-MSA LA

Demographic Information for Full Scope Area: 2014 Southern Non-MSA LA						
Demographic Characteristics	#	Low % of #	Moderate % of #	Middle % of #	Upper % of #	NA* % of #
Geographies (Census Tracts/BNAs)	34	5.88	23.53	35.29	35.29	0.00
Population by Geography	148,962	5.93	21.92	33.09	39.06	0.00
Owner-Occupied Housing by Geography	38,870	3.88	18.78	35.19	42.16	0.00
Business by Geography	13,663	5.40	22.92	32.15	39.53	0.00
Farms by Geography	784	0.77	16.07	30.48	52.68	0.00
Family Distribution by Income Level	37,775	25.74	14.53	16.77	42.96	0.00
Distribution of Low and Moderate Income Families throughout AA Geographies	15,213	8.78	29.28	33.19	28.75	0.00
Median Family Income FFIEC estimated MFI for 2014 Households Below Poverty Level		43,816 47,100 25%	Median Housing Value Unemployment Rate (2010 US Census)		82,220 2.75%	

(\*) The NA category consists of geographies that have not been assigned an income classification.  
Source: 2010 US Census and 2014 FFIEC estimated MFI

The Southern LA AA include includes three parishes – the Evangeline, Jefferson Davis, and St. Landry Parishes. There are no branches in Evangeline Parish. Because of OMB changes in 2014, Acadia Parish was removed from the AA and added to the Lafayette MSA.

WNB has a small presence in this AA with two banking offices. These branches are all non-traditional in-store offices located in Wal-Mart stores. WNB had \$2 million in deposits in this AA at June 30, 2014 according to FDIC information.

### Employment and Economic Factors

The U.S. Bureau of Labor Statistics showed that the April 2015 unemployment rates in the AA were 6.0 percent for Jefferson Davis Parish, 7.4 percent for Evangeline Parish, and 7.8 percent for St. Landry Parish. Only Jefferson Davis Parish had an unemployment rate that was lower than the unemployment rate of 7.0 for the state of Louisiana.

Local Economic Development Councils identified industry sectors as including oilfield services, healthcare, shipbuilding, construction and agriculture. The largest job gains occurred in the professional and business services, retail trade and government. Top employers included Evangeline Parish School board, Savoy Medical Center, Cooper Energy Service, Ville Platte Medical Center and Holloway Sportswear in Evangeline Parish, Jefferson Davis Parish School Board, Wal-Mart Stores, Jennings American Legion Hospital, and Leevac Industries for Jefferson Davis Parish, and Opelousas General Health System, Wal-Mart Supercenters, Evangeline Downs Racetrack and Casino, Wal-Mart Distribution Center, and Precision Drilling for St. Landry Parish.

Louisiana's economy has gained momentum in the past three years and is projected to maintain the push in 2015. The best performing sectors between March 2014 and March 2015 were educational and health services with 6,000 new jobs, and trade, transportation and utilities with 5,500 new jobs. The poorest performing sectors were government, mining and logging. Approximately \$40 billion in capital investments in new facilities and plant expansions was used for development in Southwest LA.

In addition, Jefferson Davis Parish showed improvements in job growth as local reconstruction efforts offset national economic declines and the housing market collapse. Evangeline Parish is home to the State Arboretum, Cameron Valves, Cabot Corporation, Mercy Regional and Savoy Medical Centers. A key economic tool for the parish was a 60-acre SmartSite program developed to attract businesses, create jobs, and support existing business development efforts. St. Landry Parish is the location of the 1.3 million square ft. Wal-Mart distribution center and numerous manufacturing industries. The parish is also a leader in agriculture and home to a thriving advanced healthcare industry.

### Housing

According to the 2010 Census for 2014, activity within the Southern LA AA 60.97 percent of the housing units are owner occupied, 23.97 percent are renter occupied, and 15.15 percent of the housing units are vacant. According to the Census, the median housing value was \$82,220 and the median monthly gross rent was \$504. In addition, 11.61 percent of homeowners and 9.66 percent of renters had home-related costs that exceeded 30.00 percent of their income.

Additionally, 22.66 percent of all owner occupied units and 42.16 percent of renter occupied units were located in LMI CTs. Further, 28.90 percent of all single family (1-4 unit) homes and 41.50 percent multifamily (5+ unit) housing units were located in LMI CTs.

### Competition

Banking competition is intense in the AA. According to FDIC information as of June 30, 2014, the five largest competitors include JD Bank, St. Landry Bank and Trust Company, Citizen's Bank, The Evangeline Bank and Trust Company, and St Landry Homestead Federal Savings Bank. According to the same FDIC information, WNB is ranked last of 23 banks in the AA with a deposit market share of 0.06 percent.

### Community Contact

To help identify needs and opportunities in the AA, our Community Affairs Officer interviewed an economic development organization in the Southern LA AA. The contact identified education as the highest level of concern for the community followed by primary credit needs for home improvement and refinance loans. Also, there is a need for economic development, which will provide employment for local residents.



## State of Maryland

### Salisbury, MD MSA

#### 2012 Salisbury MD MSA

Demographic Information for Full Scope Area: 2012 Salisbury MD MSA						
Demographic Characteristics	#	Low % of #	Moderate % of #	Middle % of #	Upper % of #	NA* % of #
Geographies (Census Tracts/BNAs)	27	3.70	25.93	51.85	11.11	7.41
Population by Geography	125,203	1.06	23.14	57.93	15.13	2.74
Owner-Occupied Housing by Geography	29,249	0.16	16.28	64.23	19.17	0.14
Business by Geography	9,678	1.13	22.75	59.61	16.16	0.35
Farms by Geography	574	0.52	8.71	76.48	13.76	0.52
Family Distribution by Income Level	28,689	21.27	18.14	21.72	38.87	0.00
Distribution of Low and Moderate Income Families throughout AA Geographies	11,307	2.49	34.82	52.45	10.25	0.00
Median Family Income FFIEC estimated MFI for 2012 Households Below Poverty Level		59,612 64,400 13%	Median Housing Value Unemployment Rate (2010 US Census)		183,628 4.06%	

(\*) The NA category consists of geographies that have not been assigned an income classification.  
Source: 2010 US Census and 2012 FFIEC estimated MFI

#### 2014 Salisbury MD MSA

Demographic Information for Full Scope Area: 2014 Salisbury MD MSA						
Demographic Characteristics	#	Low % of #	Moderate % of #	Middle % of #	Upper % of #	NA* % of #
Geographies (Census Tracts/BNAs)	43	2.33	18.60	58.14	13.95	6.98
Population by Geography	176,657	0.75	19.20	60.83	17.28	1.94
Owner-Occupied Housing by Geography	46,559	0.10	12.75	65.79	21.26	0.09
Business by Geography	13,659	0.71	16.29	63.20	19.62	0.18
Farms by Geography	767	0.39	8.21	77.84	13.04	0.52
Family Distribution by Income Level	43,439	19.54	17.95	21.69	40.81	0.00
Distribution of Low and Moderate Income Families throughout AA Geographies	16,289	1.73	28.85	56.51	12.91	0.00
Median Family Income FFIEC Estimated MFI for 2014 Households Below Poverty Level		60,486 64,200 12%	Median Housing Value Unemployment Rate (2010 US Census)		267,760 3.92%	

(\*) The NA category consists of geographies that have not been assigned an income classification.  
Source: 2010 US Census and 2014 FFIEC estimated MFI

The Salisbury MD-DE MMSA is comprised of Sussex County, DE as well as Somerset, Wicomico and Worcester counties in MD. In 2014, the census changed the MMSA to include the Worcester County. The bank does not have any branches in Sussex County, DE therefore the bank's designated AA includes only the three counties in Maryland. (Salisbury AA).

The bank operates three banking offices in this AA. However, there are no branches in Somerset County. These branches are all non-traditional in-store offices located in Wal-Mart stores. WNB had \$3 million in deposits in this AA based on June 30, 2014 FDIC information.

### Employment and Economic Factors

The U.S. Bureau of Labor Statistics showed that the April 2015 unemployment rate in the AA was 6.6 percent, which was higher than the unemployment rate of 5.3 percent for Maryland.

Maryland's Department of Business and Economic Development noted that the significant employers in the area are Peninsula Regional Medical Center, Salisbury University, Perdue Farms, Harrison Group, University of Maryland Eastern Shore, Labinal Salisbury, and Wal-Mart. Employment sectors are healthcare, education, accommodation/food services and manufacturing. Some of the major businesses and restaurants in the area that have closed include J.C. Penney, Mr. Paul's Legacy, Famous Dave's BBQ and Zia's Italian Restaurant. The business vacancy rate in Wicomico County is 8.4 percent.

### Housing

According to the 2010 Census for 2014, activity within the Salisbury AA 56.65 percent of the housing units are owner occupied, 29.79 percent are renter occupied, and 13.56 percent of the housing units are vacant. According to the census, the median housing value was \$183,628 and the median monthly gross rent was \$871. In addition, 18.03 percent of homeowners and 14.58 percent of renters had home-related costs that exceeded 30.00 percent of their income.

Additionally, 12.85 percent of all owner occupied units and 33.94 percent of renter occupied units were located in LMI CTs. Further, 18.35 percent of all single family (1-4 unit) homes and 7.92 percent multifamily (5+ unit) housing units were located in LMI CTs.

### Competition

Banking competition is intense in the AA. According to FDIC information as of June 30, 2014, the five largest competitors include PNC Bank, N.A., Calvin B. Taylor Banking Company of Berlin, Maryland, Hebron Savings Bank, Manufacturers and Traders Trust Company, and The Farmers Bank of Willards. According to the same FDIC information, WNB is ranked last of 15 banks in the AA for market share of deposits with a 0.09 percent market share.

### Community Contact

To help identify needs and opportunities in the Salisbury AA, the OCC's Community Affairs Officer participated in a community development roundtable. The group focused on the following areas: Services, education, job training skills, financial literacy and personal money management, homeownership counseling and transportation issues specific to the AA.

Focus groups were also held which discussed lending, access to capital for small businesses (especially start-ups), small-dollar consumer loans and affordable housing. The focus group identified these products and services as needs in the community. They also indicated that there are opportunities for financial institutions to provide technical assistance and financial literacy training to the community.

## State of Mississippi

### Gulfport-Biloxi- Pascagoula, MS MSA

#### 2012 Gulfport-Biloxi MS MSA

Demographic Information for Full Scope Area: 2012 Gulfport-Biloxi MS MSA						
Demographic Characteristics	#	Low % of #	Moderate % of #	Middle % of #	Upper % of #	NA* % of #
Geographies (Census Tracts/BNAs)	55	5.45	20.00	54.55	18.18	1.82
Population by Geography	248,820	3.58	13.44	61.78	21.16	0.03
Owner-Occupied Housing by Geography	61,111	2.60	12.17	58.50	26.73	0.00
Business by Geography	19,891	3.84	21.48	54.81	19.77	0.10
Farms by Geography	483	0.62	12.63	62.73	24.02	0.00
Family Distribution by Income Level	61,611	22.68	16.81	19.57	40.94	0.00
Distribution of Low and Moderate Income Families throughout AA Geographies	24,330	5.61	19.43	60.94	14.02	0.00
Median Family Income FFIEC estimated MFI for 2012 Households Below Poverty Level		43,269 54,800 15%	Median Housing Value Unemployment Rate (2010 US Census)		144,150 3.93%	

(\*) The NA category consists of geographies that have not been assigned an income classification.  
Source: 2010 US Census and 2012 FFIEC estimated MFI

#### 2014 Gulfport-Biloxi-Pascagoula MS MSA

Demographic Information for Full Scope Area: 2014 Gulfport-Biloxi-Pascagoula MS MSA						
Demographic Characteristics	#	Low % of #	Moderate % of #	Middle % of #	Upper % of #	NA* % of #
Geographies (Census Tracts/BNAs)	80	5.00	22.50	53.75	17.50	1.25
Population by Geography	370,702	2.76	13.90	61.96	21.35	0.02
Owner-Occupied Housing by Geography	92,181	2.13	12.38	60.21	25.28	0.00
Business by Geography	23,211	3.36	19.51	54.53	22.54	0.06
Farms by Geography	521	0.38	12.28	64.11	23.22	0.00
Family Distribution by Income Level	92,171	21.82	17.09	20.42	40.67	0.00
Distribution of Low and Moderate Income Families throughout AA Geographies	35,864	4.57	20.15	61.68	13.60	0.00
Median Family Income FFIEC estimated for 2014 Households Below Poverty Level		54,001 57,100 14%	Median Housing Value Unemployment Rate (2010 US Census)		139,797 4.16%	

(\*) The NA category consists of geographies that have not been assigned an income classification.  
Source: 2010 US Census and 2014 FFIEC estimated MFI

The Gulfport-Biloxi-Pascagoula MSA (Gulfport AA) is located in Mississippi and is bordered by the Gulf of Mexico. The Gulfport-Biloxi-Pascagoula AA changed because of new OMB designations in 2014. The Gulfport-Biloxi MSA combined with the Pascagoula MSA. In addition, Stone County was removed from the Gulfport-Biloxi MSA. The Gulfport AA includes the counties of Hancock, Harrison and Jackson.

WNB has six branches in the AA. These branches are all non-traditional in-store offices located in Wal-Mart stores. WNB had \$4 million in deposits in this AA as of June 30, 2014.

The principal cities in the Gulfport-Biloxi-Pascagoula AA are Gulfport and Biloxi, Mississippi. West Gulfport is the largest city by population in the AA and the second largest city in the state of Mississippi.

### Employment and Economic Factors

The April 2015 U.S. Bureau of Labor Statistics for the Gulfport AA had an unemployment rate of 7.0 percent, which is same as the unemployment rate for the state of Mississippi.

There were hurricanes and the BP oil spill disaster between 2005 and 2008 that negatively impacted the area through physical/structural damages and job loss. The Consolidated Plans for the cities of Pascagoula and of Biloxi for 2014 stated that despite these issues, they are on their way towards a complete recovery and renewal. The cities continue to work vigorously to attract new investments and economic opportunity, while striving to preserve the heritage and unique character of its neighborhoods.

The Mississippi Coast Major Employers and the Harrison County Development Commission identified the top employers and industries in AA as of July 2014. Those companies are Keesler Air Force Base, Ingalls Shipbuilding, Chevron U.S.A., Inc., and Memorial Hospital at Gulfport.

### Housing

According to the 2010 Census for 2014 activity within the Gulfport-Biloxi-Pascagoula AA, 58.33 percent of housing units are owner occupied, 25.16 percent are renter occupied, and 16.50 percent of housing units are vacant. According to the census, the median housing value was \$139,797 and the median monthly gross rent was \$838. In addition, 15.02 percent of homeowners and 10.97 percent of renters had home-related costs that exceeded 30.00 percent of their income.

Additionally, 14.51 percent of all owner occupied units and 25.41 percent of renter occupied units were located in LMI CTs. Further, 18.86 percent of all single family (1-4 unit) homes and 25.63 percent multifamily (5+ units) housing units were located in LMI CTs.

### Competition

Banking competition is intense in this AA. According to FDIC information as of June 30, 2014, the five largest competitors include Whitney Bank, Bancorp South Bank, Merchants & Marine Bank, The Peoples Bank, Biloxi, MS, and The First A National Banking Association. According to the same FDIC information, WNB is ranked 14 out of 16 banks in the AA for market share of deposits with a 0.09 percent market share.

Community Contact

To help identify needs and opportunities in the AA, our Community Affairs Officer interviewed a business and labor group in the AA. The contact identified the need for advance training for existing businesses that are not prospering as they should.

The contact also indicated that there is a need for financial institutions to offer services that support training and financial education.

**State of New York****Utica-Rome, NY MSA****2012 Utica-Rome NY MSA**

Demographic Information for Full Scope Area: 2012 Utica-Rome NY MSA						
Demographic Characteristics	#	Low % of #	Moderate % of #	Middle % of #	Upper % of #	NA* % of #
Geographies (Census Tracts/BNAs)	93	8.60	16.13	48.39	20.43	6.45
Population by Geography	299,397	6.71	14.14	53.10	24.02	2.03
Owner-Occupied Housing by Geography	81,329	2.90	8.83	60.02	28.23	0.01
Business by Geography	17,343	4.65	13.45	55.27	25.23	1.41
Farms by Geography	969	0.83	2.58	78.53	17.96	0.10
Family Distribution by Income Level	76,949	21.06	17.28	21.41	40.26	0.00
Distribution of Low and Moderate Income Families throughout AA Geographies	29,502	11.51	20.02	55.18	13.26	0.03
Median Family Income FFIEC estimated MFI for 2012 Households Below Poverty Level		56,800 58,800 14%	Median Housing Value Unemployment Rate (2010 US Census)		103,754 3.29%	

(\*) The NA category consists of geographies that have not been assigned an income classification.  
Source: 2010 US Census and 2012 FFIEC estimated MFI

**2014 Utica-Rome NY MSA**

Demographic Information for Full Scope Area: 2014 Utica-Rome NY MSA						
Demographic Characteristics	#	Low % of #	Moderate % of #	Middle % of #	Upper % of #	NA* % of #
Geographies (Census Tracts/BNAs)	93	8.60	16.13	48.39	20.43	6.45
Population by Geography	299,397	6.71	14.14	53.10	24.02	2.03
Owner-Occupied Housing by Geography	81,329	2.90	8.83	60.02	28.23	0.01
Business by Geography	15,491	4.53	13.47	55.14	25.47	1.40
Farms by Geography	895	0.89	2.12	78.66	18.32	0.00
Family Distribution by Income Level	76,949	21.06	17.28	21.41	40.26	0.00
Distribution of Low and Moderate Income Families throughout AA Geographies	29,502	11.51	20.02	55.18	13.26	0.03
Median Family Income FFIEC estimated MFI for 2014 Households Below Poverty Level		56,800 59,500 14%	Median Housing Value Unemployment Rate (2010 US Census)		103,754 3.29%	

(\*) The NA category consists of geographies that have not been assigned an income classification.  
Source: 2010 US Census and 2014 FFIEC estimated MFI

The Utica-Rome New York MSA AA (Utica-Rome AA) encompasses the counties of Herkimer and Oneida. The Utica-Rome AA is located in central New York State.

WNB operates two banking offices in the Utica-Rome AA. These branches are all non-traditional in-store offices located in Wal-Mart stores. WNB had \$3 million in deposits in this AA as of June 30, 2014 according to FDIC information.

### Employment and Economic Factors

The U.S. Bureau of Labor Statistics showed that the April 2015 unemployment rate for the MSA was 5.4 percent, which was higher than the unemployment rate of 5.3 percent for the state of New York.

Forbes.com discussed in December 2013 that Remington Arms Company has doubled its workforce in the past two years and invested \$20 million into the factory because of the surge in gun sales. The city of Ilion (Herkimer County) is home to Remington. However, the Sinclair Broadcast Group, Inc. announced layoffs in 2014. The layoffs at Remington impacted the employees and economy in the Mohawk Valley.

Syracuse Media Group announced that Oneida, Ltd. will close its regional office and outlet store in 2015. In April 2015, the Wall Street Journal indicated that EveryWare Global, Inc., maker of Anchor Hocking and Oneida kitchen products, filed for chapter 11 bankruptcy protection.

The Observer Dispatch in Utica announced in October 2013 that Nanotech was receiving \$1.5 billion in public and private investments for 1,000 technology jobs for the SUNY Poly Technic Institute construction. Albany College will help the Institute train prospective employees.

City-Data.com stated that the significant employers in Oneida County were Conmed Corporation, St. Elizabeth Medical Hospital and Utica City School District. In Herkimer County, the major employers were Oneida Indian Nation and Nation Enterprises, Mohawk Valley Network, and St. Elizabeth Medical Center. The top industries in the AA are retail trade, manufacturing, and accommodation and food services.

The City of Rome's Consolidated Plan of 2014 noted that it met the challenges of the economic crisis by using strategic, targeted maneuvers. Through planning and vision, each dollar of the Community Development Block Grant (CDBG) will be leveraged with related grant opportunities and private investment. The CDBG is one component to economic recovery. The plan calls for the rebuilding of aging infrastructure. The city plans to adapt its strategy to meet the needs of small business, micro-enterprises, entrepreneurs and commercial development.

### Housing

According the 2010 Census for 2014 activity within the Utica-Rome AA, 59.25 percent of the housing units are owner occupied, 26.97 percent are renter occupied, and 13.78 percent of the housing units are vacant. According to the census, the median housing value was \$103,754 and median monthly gross rent was \$628. In addition, 13.28 percent of homeowners and 12.12 percent of renters had home-related costs that exceeded 30.00 percent of their income.

Additionally, 11.73 percent of all owner occupied units and 42.41 percent of renter occupied units were located in LMI CTs. Further, 20.38 percent of all single family (1-4 unit) homes and 42.96 percent multifamily (5+ unit) housing units were located in LMI CTs.

### Competition

Banking competition is intense in this AA. According to FDIC information as of June 30, 2014, the five largest competitors include Bank of Utica, Manufacturers and Traders Trust Company, Berkshire Bank, Adirondack Bank, and NBT, N.A. According to the same FDIC information, WNB is ranked 11 out of 12 banks in the AA for market share of deposits with a 0.08 percent market share.

### Community Contact

To help identify needs and opportunities in the AA, our Community Affairs Officer interviewed a housing organization that provides homeownership counseling, financial literacy, and home rehabilitation programs in the AA. The representative indicated that there is a need for affordable housing programs including first time home ownership programs. There are opportunities for financial institutions to provide additional grant money in the form of down payment assistance for borrowers as most of the housing stock in the area is older.



## State of North Carolina

### Winston-Salem NC MSA

#### 2012 Winston-Salem NC MSA

Demographic Information for Full Scope Area: 2012 Winston-Salem NC MSA						
Demographic Characteristics	#	Low % of #	Moderate % of #	Middle % of #	Upper % of #	NA* % of #
Geographies (Census Tracts/BNAs)	116	9.48	18.10	38.79	33.62	0.00
Population by Geography	477,717	6.33	20.28	40.24	33.15	0.00
Owner-Occupied Housing by Geography	130,256	2.39	14.99	44.82	37.80	0.00
Business by Geography	38,359	3.99	15.85	41.21	38.95	0.00
Farms by Geography	1,473	1.15	15.14	52.61	31.09	0.00
Family Distribution by Income Level	123,967	21.03	17.19	20.21	41.56	0.00
Distribution of Low and Moderate Income Families throughout AA Geographies	47,384	10.73	28.05	42.59	18.64	0.00
Median Family Income FFIEC estimated MFI for 2012 Households Below Poverty Level		57,577 62,000 14%	Median Housing Value Unemployment Rate (2010 US Census)		145,649 3.87%	

(\*) The NA category consists of geographies that have not been assigned an income classification.  
Source: 2010 US Census and 2012 FFIEC estimated MFI

#### 2014 Winston-Salem NC MSA

Demographic Information for Full Scope Area: 2014 Winston-Salem NC MSA						
Demographic Characteristics	#	Low % of #	Moderate % of #	Middle % of #	Upper % of #	NA* % of #
Geographies (Census Tracts/BNAs)	150	8.67	18.67	43.33	29.33	0.00
Population by Geography	640,595	5.96	19.94	45.35	28.75	0.00
Owner-Occupied Housing by Geography	177,486	2.41	14.84	49.93	32.82	0.00
Business by Geography	42,651	4.35	17.17	44.59	33.88	0.00
Farms by Geography	1,695	1.24	14.40	54.93	29.44	0.00
Family Distribution by Income Level	169,125	21.29	17.48	20.77	40.45	0.00
Distribution of Low and Moderate Income Families throughout AA Geographies	65,578	9.93	27.14	46.49	16.45	0.00
Median Family Income FFEIC estimated MFI for 2014 Households Below Poverty Level		56,529 59,300 14%	Median Housing Value Unemployment Rate (2010 US Census)		140,154 4.09%	

(\*) The NA category consists of geographies that have not been assigned an income classification.  
Source: 2010 US Census and 2014 FFIEC estimated MFI

The Winston-Salem NC MSA (Winston-Salem AA) added Davidson County in 2014 because of a change in the OMB designations. The Winston-Salem MSA is a region of NC located in the center of the state and is the fifth largest city in the state of NC.

WNB operates seven banking offices in Davie and Davidson counties. These branches are all non-traditional in-store offices located in Wal-Mart stores. WNB had \$4 million in deposits in this AA as of June 30, 2014 according to FDIC information.

### Employment and Economic Factors

The U.S. Bureau of Labor Statistics showed that the April 2015 unemployment rate for the AA was 5.6 percent, which was lower than the unemployment rate of 5.9 percent for North Carolina.

The NC Division of Employment Security noted that the largest decrease was in manufacturing. Industries that experienced smaller losses were trade, transportation and utilities, construction and finance, insurance and real estate. Annual average employment for education and health services increased by 41 percent. Examples of the shift in employment include the expansion of the Piedmont Triad Research Park and two major hospitals, and the construction of the Veterans Administration Hospital. The city will continue to recruit businesses in fields of medicine, information technology, fabrication and manufacturing, and services.

### Housing

According to the 2010 Census for 2014, activity within the Winston-Salem AA, 62.86 percent of the housing units are owner occupied, 25.89 percent are renter occupied, and 11.24 percent of the housing units are vacant. According to the Census, the median housing value was \$140,154 and median monthly gross rent was \$653. In addition, 14.81 percent of homeowners and 11.01 percent of renters had home-related costs that exceeded 30.00 percent of their income.

Additionally, 17.25 percent of all owner occupied units and 45.67 percent of renter occupied units were located in LMI CTs. Further, 23.67 percent of all single family (1-4 unit) homes and 50.91 percent multifamily (5+unit) housing units were located in LMI CTs.

### Competition

Banking competition is intense in this AA. According to FDIC information as of June 30, 2014, the five largest competitors include Branch Banking & Trust Company, Wells Fargo Bank, N.A., Bank of North Carolina, SunTrust Bank, and Piedmont FSB. According to June 30, 2014 FDIC information, WNB is ranked last out of 11 banks in the AA with a deposit market share of 0.13 percent.

### Community Contact

In conjunction with this CRA exam, the Community Affairs Officer contacted a group in the Winston-Salem AA to ascertain the community's credit needs and opportunities for financial institutions to help meet those needs. The Officer contacted a nonprofit group that offers homeownership opportunities to families who are unable to obtain conventional house financing. The representative indicated that there is a need for financial education programs for LMI individuals of all ages. Also, there is an opportunity for financial institutions to offer services targeted to the unbanked community.

## State of Ohio

### Toledo MSA

#### 2012 Toledo OH MSA

Demographic Information for Full Scope Area: 2012 Toledo OH MSA						
Demographic Characteristics	#	Low % of #	Moderate % of #	Middle % of #	Upper % of #	NA* % of #
Geographies (Census Tracts/BNAs)	177	15.25	16.95	42.94	24.29	0.56
Population by Geography	651,429	8.83	15.57	45.55	29.25	0.80
Owner-Occupied Housing by Geography	178,021	5.30	11.79	49.03	33.89	0.00
Business by Geography	46,759	6.14	12.93	45.73	34.98	0.21
Farms by Geography	2,093	1.29	4.49	61.59	32.63	0.00
Family Distribution by Income Level	166,319	21.24	16.76	20.50	41.50	0.00
Distribution of Low and Moderate Income Families throughout AA Geographies	63,203	17.19	21.88	45.11	15.80	0.01
Median Family Income FFIEC estimated MFI for 2012 Households Below Poverty Level		59,003 62,600 16%	Median Housing Value Unemployment Rate (2010 US Census)		131,090 5.84%	

(\*) The NA category consists of geographies that have not been assigned an income classification.  
Source: 2010 US Census and 2012 FFIEC estimated MFI

#### 2014 Toledo OH MSA

Demographic Information for Full Scope Area: 2014 Toledo OH MSA						
Demographic Characteristics	#	Low % of #	Moderate % of #	Middle % of #	Upper % of #	NA* % of #
Geographies (Census Tracts/BNAs)	164	16.46	18.29	42.68	21.95	0.61
Population by Geography	610,001	9.43	16.63	45.30	27.78	0.85
Owner-Occupied Housing by Geography	163,295	5.77	12.85	48.96	32.41	0.00
Business by Geography	36,917	6.36	13.94	45.13	34.49	0.07
Farms by Geography	1,590	1.70	4.21	64.03	30.06	0.00
Family Distribution by Income Level	153,896	21.88	16.99	20.48	40.65	0.00
Distribution of Low and Moderate Income Families throughout AA Geographies	59,819	18.16	23.12	44.13	14.57	0.02
Median Family Income FFIEC estimated MFI for 2014 Households Below Poverty Level		58,200 60,800 16%	Median Housing Value Unemployment Rate (2010 US Census)		127,571 5.98%	

(\*) The NA category consists of geographies that have not been assigned an income classification.  
Source: 2010 US Census and 2014 FFIEC estimated MFI

In 2014, the Toledo Ohio MSA AA (Toledo AA) changed because of the new OMB designations, and Ottawa County was removed from the AA. The Toledo AA encompasses the counties of Fulton, Lucas, and Wood.

WNB operates seven branch locations in the Toledo AA. These branches are all non-traditional in-store offices located in Wal-Mart stores. WNB had \$7 million in deposits in this AA according to June 30, 2014 information.

### Employment and Economic Factors

The U.S. Bureau of Labor Statistics showed that the April 2015 unemployment rate for the AA was 4.8 percent, which was lower than the unemployment rate of 4.9 percent for Ohio.

City-Data.com stated that manufacturing comprises one-fifth of Toledo's economic base. Toledo is home and headquarters for The Andersons, Dana Corporation, Libbey, Inc., Libbey-Owens-Ford Company, Owens Corning, Owens-Illinois, and Seaway Food Town. Major employers include DaimlerChrysler, General Motors/Powertrain, ProMedica Health Systems, and Toledo Public Schools. Major pillars in the economy are medical and technology based or education (university systems and public schools). Diversification of the workforce and improved educational attainment will be crucial to protecting the Toledo economy. The Regional Growth Partnership, Inc., which is nonprofit, is charged with creating employment and capital investment to generate economic growth in greater Toledo and northwest Ohio.

### Housing

According to the 2010 Census for 2014, activity within the Toledo AA, 59.83 percent of the housing units are owner occupied, 29.56 percent are renter occupied, and 10.61 percent of the housing units are vacant. According to the Census, the median housing value was \$127,571 and median monthly gross rent was \$639. In addition, 16.19 percent of homeowners and 13.98 percent of renters had home-related costs that exceeded 30.00 percent of their income.

Additionally, 18.62 percent of all owner occupied units and 44.30 percent of renter occupied units were located in LMI CTs. Further, 27.44 percent of all single family (1-4 unit) homes and 39.36 percent multifamily (5+ unit) housing units were located in LMI CTs.

### Competition

Banking competition is intense in this AA. According to FDIC information as of June 30, 2014, the five largest competitors include Fifth Third Bank, The Huntington National Bank, Key Bank, N.A., PNC Bank, N.A., and Citizens Bank, N.A. According to the same FDIC information, WNB is ranked last out of 19 banks in the AA for market share of deposits with a 0.07 percent market share.

### Community Contact

To help identify needs and opportunities in the AA, our Community Affairs Officer interviewed two community development organizations in the MSA. One is a community development organization and the other provides affordable housing for LMI individuals. Both representatives indicated the need for additional affordable housing in the area as well as foreclosure assistance funding for LMI borrowers. In addition, both representatives noted the opportunity for financial institutions to provide financial literacy programs in the AA.

# State of Pennsylvania

## Montgomery County MSA

Demographic Information for Full Scope Area: Montgomery County MSA						
Demographic Characteristics	#	Low % of #	Moderate % of #	Middle % of #	Upper % of #	NA* % of #
Geographies (Census Tracts/BNAs)	470	2.98	22.55	45.53	28.30	0.64
Population by Geography	1,924,009	2.41	19.73	48.03	29.47	0.35
Owner-Occupied Housing by Geography	547,462	0.86	17.36	50.27	31.52	0.00
Business by Geography	220,511	1.35	17.28	46.79	34.54	0.04
Farms by Geography	5,359	0.56	16.09	53.50	29.86	0.00
Family Distribution by Income Level	502,792	18.70	18.39	22.99	39.92	0.00
Distribution of Low and Moderate Income Families throughout AA Geographies	186,483	4.28	30.81	48.05	16.87	0.00
Median Family Income FFIEC estimated MFI for 2012 Households Below Poverty Level		74,80893.72 1 79,200 6%	Median Housing Value Unemployment Rate (2010 US Census)		326,573 2.94%	

(\*) The NA category consists of geographies that have not been assigned an income classification.  
Source: 2010 US Census and 2012 FFIEC estimated MFI

### 2014 Montgomery Co-Bucks Co-Chester Co PA MD

Demographic Information for Full Scope Area: 2014 Montgomery Co-Bucks Co-Chester Co PA MD						
Demographic Characteristics	#	Low % of #	Moderate % of #	Middle % of #	Upper % of #	NA* % of #
Geographies (Census Tracts/BNAs)	470	2.98	22.55	45.53	28.30	0.64
Population by Geography	1,924,009	2.41	19.73	48.03	29.47	0.35
Owner-Occupied Housing by Geography	547,462	0.86	17.36	50.27	31.52	0.00
Business by Geography	190,443	1.35	17.34	47.03	34.25	0.05
Farms by Geography	4,959	0.63	15.51	53.78	30.09	0.00
Family Distribution by Income Level	502,792	18.70	18.39	22.99	39.92	0.00
Distribution of Low and Moderate Income Families throughout AA Geographies	186,483	4.28	30.81	48.05	16.87	0.00
Median Family Income FFIEC Estimated MFI for 2014 Households Below Poverty Level		93,721 95,400 6%	Median Housing Value Unemployment Rate (2010 US Census)		326,573 2.94%	

(\*) The NA category consists of geographies that have not been assigned an income classification.  
Source: 2010 US Census and 2014 FFIEC estimated MFI

The Montgomery-Bucks-Chester County PA MD AA (Montgomery County AA) is a part of the Philadelphia-Camden-Wilmington MSA. The Montgomery County AA is located in the southeastern region of Pennsylvania and comprised of Bucks, Chester and Montgomery counties.

WNB operates four branch locations in the Montgomery County AA. These branches are all non-traditional in-store offices located in Wal-Mart stores. WNB had \$2 million in deposits in this AA as of June 30, 2014 according to FDIC information.

### Employment and Economic Factors

The U.S. Bureau of Labor Statistics showed that the April 2015 unemployment rate for the AA was 5.7 percent, which was lower than the unemployment rate of 5.4 percent for Pennsylvania.

The PA Department of Labor reported the largest employers in Bucks County as Giant Food Stores, LLC, Johnson & Johnson Pharmaceuticals, St. Mary Medical Center, and Central Bucks School District. In Chester County, the department reported Vanguard Group, Inc., QVC Network, Inc., Siemens Medical Solutions USA, Inc., the federal government, County of Chester and Giant Food Stores. The largest employers in Chester County are educational institutions, pharmaceutical and medicine manufacturers. In Montgomery County, the department reported Merck Sharp & Dohme Corporation, Comcast, Abington Memorial Hospital, Main Line Hospitals, Giant Food Stores LLC and Glaxosmithkline.

Central Penn Business Journal indicated that Chester County agriculture remains a prominent industry and an irreplaceable resource. Growth areas include urban landscapes and suburban centers. Montgomery County has a diverse economic base and includes open farmlands to urban row housing. However, government and information sectors decreased their staffing. The AA is in need of new businesses to create job growth.

According to the Montgomery County Business Development, Fulton-Montgomery Community College plans to expand its operations. The college and center have formed a strategic partnership to advance economic and workforce development. Carolina Clubs plan on relocating to the county and hiring locally. Amsterdam Printing will invest more than \$6 million over the next seven years, retain 365 jobs and set a course of employment growth.

In 2014 and 2015, Philly.com and LehighValleyLive.com announced that the 66 Bottom Dollar Food Stores would close and would sell the locations to Aldi. The loss of 2,200 jobs affected Bucks and Montgomery counties. Aldi announced in March 2015 that it would open 30 of the 66 former Bottom Dollar stores in PA; however, none of the AA's stores would reopen. Aldi plans to sublet or dispose of the unwanted stores.

### Housing

According to the 2010 Census for 2014 activity within the Montgomery County AA, 72.42 percent of the housing units are owner occupied, 22.47 percent are renter occupied, and 5.11 percent of the housing units are vacant. According to the Census, the median housing value was \$326,573 and median monthly gross rent was \$1,072. Home-related costs exceeded 30.00 percent of net income for 22.43 percent of homeowners and 9.89 percent of renters.

Additionally, 18.22 percent of all owner occupied units and 40.83 percent of renter occupied units were located in LMI CTs. Further, 22.07 percent of all single family (1-4 unit) homes and 35.34 percent multifamily (5+ units) housing units were located in LMI CTs.

### Competition

Banking competition is intense in this AA. According to FDIC information as of June 30, 2014, the five largest competitors include Wells Fargo Bank, N.A., TD Bank, N.A., Citizens Bank of Pennsylvania, PNC Bank, N.A., and First Niagara Bank, N.A. According to the same FDIC information, WNB is ranked 61 out of 64 banks in the AA for market share of deposits with a 0.00 percent market share.

### Community Contact

To help identify needs and opportunities in the AA, our Community Affairs Officer interviewed two community development organizations in the AA, an affordable housing organization and an organization that provides financial counseling assistance. Representatives from these organizations identified the following needs in the AA: low rate mortgage loans, donations for local community development projects, first-time homebuyers programs and down payment assistance.

## State of South Carolina

### Columbia MSA

#### 2012 Columbia SC MSA

Demographic Information for Full Scope Area: 2012 Columbia SC MSA						
Demographic Characteristics	#	Low % of #	Moderate % of #	Middle % of #	Upper % of #	NA* % of #
Geographies (Census Tracts/BNAs)	191	5.24	30.37	34.03	27.75	2.62
Population by Geography	767,598	3.58	27.81	36.13	30.18	2.30
Owner-Occupied Housing by Geography	197,959	0.99	26.09	38.73	34.19	0.00
Business by Geography	53,827	2.73	24.30	38.91	33.34	0.72
Farms by Geography	1,543	0.78	35.06	37.98	26.05	0.13
Family Distribution by Income Level	187,576	21.79	17.48	20.36	40.37	0.00
Distribution of Low and Moderate Income Families throughout AA Geographies	73,671	4.66	40.59	38.18	16.57	0.00
Median Family Income FFIEC estimated MFI for 2012 Households Below Poverty Level		60,605 64,500 13%	Median Housing Value Unemployment Rate (2010 US Census)		144,427 3.94%	

(\*) The NA category consists of geographies that have not been assigned an income classification.

Source: 2010 US Census and 2012 FFIEC estimated MFI

#### 2014 Columbia SC MSA

Demographic Information for Full Scope Area: 2014 Columbia SC MSA						
Demographic Characteristics	#	Low % of #	Moderate % of #	Middle % of #	Upper % of #	NA* % of #
Geographies (Census Tracts/BNAs)	191	5.24	30.37	34.03	27.75	2.62
Population by Geography	767,598	3.58	27.81	36.13	30.18	2.30
Owner-Occupied Housing by Geography	197,959	0.99	26.09	38.73	34.19	0.00
Business by Geography	46,562	2.63	24.17	39.01	33.40	0.79
Farms by Geography	1,424	0.77	34.55	37.78	26.83	0.07
Family Distribution by Income Level	187,576	21.79	17.48	20.36	40.37	0.00
Distribution of Low and Moderate Income Families throughout AA Geographies	73,671	4.66	40.59	38.18	16.57	0.00
Median Family Income FFIEC estimated MFI for 2014 Households Below Poverty Level		60,605 58,000 13%	Median Housing Value Unemployment Rate (2010 US Census)		144,427 3.94%	

(\*) The NA category consists of geographies that have not been assigned an income classification.

Source: 2010 US Census and 2014 FFIEC estimated MFI

The Columbia SC MSA (Columbia AA) is the second largest MSA in the state of South Carolina. The Columbia AA encompasses the counties of Calhoun, Fairfield, Kershaw, Lexington, Richland, and Saluda.



WNB operates five branch locations in the AA. These branches are all non-traditional in-store offices located in Wal-Mart stores. WNB had \$5 million in deposits in the Columbia AA at June 30, 2014 according to FDIC information.

### Employment and Economic Factors

The U.S. Bureau of Labor Statistics showed that the April 2015 unemployment rate for the AA was 6.0 percent, which was lower than the 6.5 percent unemployment rate for South Carolina.

CentralSC.org showed that the AA has a large mix of industry and services. The largest employers for the counties are Calhoun County, DAK Americas, Devro, Inc., Zeus Industrial Products, The Fitts Company, Fairfield County, VC Summer Nuclear Station, Ben Arnold Beverage Co., Lang Mekra North America, Performance Fibers and Isola Laminate Systems.

The SC Department of Commerce published that Fort Jackson, which is located in Columbia and is a large early training facility for the US Army, generated \$2 billion in economic activity for the state in 2011. However, the report showed that one job on the base equaled 11 supportive jobs off the base. Since the number of jobs generated by the Fort had diminished to 16,460, this has caused a negative impact overall. The city of Columbia has the highest population density in the AA. Economic development is one of the largest concerns.

Central SC indicated the region has the ideal mix of supportive government, low tax rates and business incentive packages. The readySC program trains employees on behalf of employers. All training is funded through tax dollars. The region boasts a high concentration of retail, accommodation, and food services employment.

### Housing

According to the 2010 Census for 2014, activity within the Columbia AA, 61.38 percent of the housing units are owner occupied, 27.85 percent are renter occupied, and 10.76 percent of housing units are vacant. According to the Census, the median housing value in the Columbia AA was \$144,427 and the median monthly gross rent was \$758. Home-related costs exceeded 30.00 percent of net income for 14.92 percent of homeowners and 12.25 percent of renters.

Additionally, 27.08 percent of all owner occupied units and 45.60 percent of renter occupied units were located in LMI CTs. Further, 29.46 percent of all single family (1-4 unit) homes and 47.23 percent of multifamily (5+units) housing units were located in LMI CTs.

### Competition

Banking competition is intense in this AA. According to FDIC information as of June 30, 2014, the five largest competitors include Wells Fargo Bank, N.A., Bank of America, N.A., Branch Banking & Trust Company, First Citizens Bank and Trust Company, Inc., and Synovus Bank. According to the same FDIC information, WNB is ranked 27 out of 28 banks in the AA for a deposit market share of 0.03 percent.

Community Contact

To help identify needs and opportunities in the AA, our Community Affairs Officer interviewed an economic development organization in the Columbia AA. The representative indicated that there is a need for loans to small businesses and consumers.

# State of Virginia

## Richmond MSA

### 2012 Richmond VA MSA

Demographic Information for Full Scope Area: 2012 Richmond VA MSA						
Demographic Characteristics	#	Low % of #	Moderate % of #	Middle % of #	Upper % of #	NA* % of #
Geographies (Census Tracts/BNAs)	230	9.57	21.74	32.61	35.65	0.43
Population by Geography	960,401	7.69	19.08	32.73	40.51	0.00
Owner-Occupied Housing by Geography	247,771	3.63	13.94	35.18	47.24	0.00
Business by Geography	101,796	4.96	18.44	32.65	43.85	0.10
Farms by Geography	2,244	2.41	11.76	35.12	50.71	0.00
Family Distribution by Income Level	240,853	19.50	16.95	20.55	42.99	0.00
Distribution of Low and Moderate Income Families throughout AA Geographies	87,797	14.70	28.99	34.24	22.06	0.00
Median Family Income FFIEC estimated MFI for 2012 Households Below Poverty Level		71,292 75,600 10%	Median Housing Value Unemployment Rate (2010 US Census)		240,823 3.59%	

(\*) The NA category consists of geographies that have not been assigned an income classification.  
Source: 2010 US Census and 2012 FFIEC estimated MFI

### 2014 Richmond VA MSA

Demographic Information for Full Scope Area: 2014 Richmond VA MSA						
Demographic Characteristics	#	Low % of #	Moderate % of #	Middle % of #	Upper % of #	NA* % of #
Geographies (Census Tracts/BNAs)	224	9.82	22.32	32.59	34.82	0.45
Population by Geography	927,248	7.96	19.76	33.09	39.19	0.00
Owner-Occupied Housing by Geography	237,404	3.79	14.55	35.81	45.85	0.00
Business by Geography	87,940	5.11	19.05	32.81	42.92	0.11
Farms by Geography	1,894	2.64	13.15	34.53	49.68	0.00
Family Distribution by Income Level	231,138	19.75	17.04	20.68	42.53	0.00
Distribution of Low and Moderate Income Families throughout AA Geographies	85,040	15.18	29.93	34.44	20.45	0.00
Median Family Income FFIEC estimated MFI for 2014 Households Below Poverty Level		71,605 76,400 10%	Median Housing Value Unemployment Rate (2010 US Census)		241,467 3.61%	

(\*) The NA category consists of geographies that have not been assigned an income classification.  
Source: 2010 US Census and 2014 FFIEC estimated MFI

The Richmond VA MSA AA (Richmond AA) includes Chesterfield, Hanover, and Henrico counties.

WNN operates eight branches in the Richmond AA. These branches are all non-traditional in-store offices located in Wal-Mart stores. WNB had \$7 million in deposits in this AA as of June 30, 2014 according to FDIC information.

### Employment and Economic Factors

According to the April 2015 Bureau of Labor Statistics, the Richmond AA had an unemployment rate of 4.8 percent, which is higher than unemployment rate of 4.2 percent for Virginia.

The Virginia Economic Development issued a community profile on the Richmond AA. Richmond, the capital of Virginia, is home to nine Fortune 1000 companies – Altria Group, Dominion Resources, Genworth Financial, CarMax, Owens and Minor, MeadWestvaco, Brink's Markel, Universal Tobacco and NewMarket Chemicals. The Virginia Bio Technology Research Park has emerged as one of the leading research facilities in the Mid-Atlantic. Virginia Commonwealth University ranks among the top 200 universities in the country in sponsored research. However, the region is not dependent on a single industry.

The Richmond Times-Dispatch published that in April 2014 Kroger Market place opened in Henrico County, adding 425 full- and part-time jobs to the retail-trade subsector. In June, Shandon Tranlin Paper Company, a Chinese manufacturer, announced plans to build a \$2 billion paper and fertilizer production facility in Chesterfield County, creating 2,000 new manufacturing jobs by 2020. Significant employers in the AA are Capital One Financial Group, VA Commonwealth University Health System, HCA VA Health System, Bon Secours Richmond Health System, Wal-Mart, Dominion Resources, SunTrust Bank, Inc., Food Lion LLC, Altria Group, Inc., and Amazon.com.

The VA Employment Commission stated that the primary industry sectors in the AA are education and health services, professional and business services, retail trade, leisure and hospitality, public administration, finance and insurance, construction, manufacturing, wholesale trade, and transportation and warehousing.

### Housing

According the 2010 Census for 2014, activity within the Richmond AA, 61.59 percent of the housing units are owner occupied, 30.19 percent are renter occupied, and 8.21 percent of the housing units are vacant. According to the Census, the median housing value was \$241,467 and median monthly gross rent was \$903. In addition, 17.57 percent of homeowners and 14.78 percent of renters had home-related costs that exceeded 30.00 percent of their income.

Additionally, 18.34 percent of all owner occupied units and 48.53 percent of renter occupied units were located in LMI CTs. Further, 25.20 percent of all single family (1-4 unit) homes and 48.06 percent multifamily (5+ unit) housing units were located in LMI CTs.

### Competition

Banking competition is intense in this AA. According to FDIC information as of June 30, 2014, the five largest competitors include Capital One, N.A., Bank of America, N.A., Wells Fargo Bank, N.A., SunTrust Bank and Branch Banking & Trust Company.

According to the same FDIC information, WNB is ranked 29 out of 30 banks in the AA with a deposit market share of 0.01 percent.

Community Contact

To help identify needs and opportunities, our Community Affairs Officer interviewed a community development organization in the AA. The organization provides affordable housing, including revitalization and rehabilitation, to LMI senior citizens. The representative identified the rehabilitation of homes as a need for citizens who are wheelchair bound. The representative stated that financial institutions have an opportunity to assist in the rehabilitation or revitalization of housing projects by volunteering or funding.

## State of West Virginia

### Huntington-Ashland MSA

#### 2012 Huntington-Ashland WV MSA

Demographic Information for Full Scope Area: 2012 Huntington-Ashland WV MSA						
Demographic Characteristics	#	Low % of #	Moderate % of #	Middle % of #	Upper % of #	NA* % of #
Geographies (Census Tracts/BNAs)	29	13.79	34.48	31.03	20.69	0.00
Population by Geography	96,319	10.77	22.64	41.41	25.18	0.00
Owner-Occupied Housing by Geography	26,030	4.71	18.09	45.21	31.99	0.00
Business by Geography	7,047	7.98	32.94	34.40	24.69	0.00
Farms by Geography	150	3.33	9.33	53.33	34.00	0.00
Family Distribution by Income Level	24,695	22.65	19.11	18.42	39.82	0.00
Distribution of Low and Moderate Income Families throughout AA Geographies	10,313	11.92	30.87	39.44	17.77	0.00
Median Family Income FFIEC estimated MFI for 2012 Households Below Poverty Level		49,772 50,300 20%	Median Housing Value Unemployment Rate (2010 US Census)		93,910 3.09%	

(\*) The NA category consists of geographies that have not been assigned an income classification.  
Source: 2010 US Census and 2012 FFIEC estimated MFI

#### 2014 Huntington-Ashland WV MSA

Demographic Information for Full Scope Area: 2014 Huntington-Ashland WV MSA						
Demographic Characteristics	#	Low % of #	Moderate % of #	Middle % of #	Upper % of #	NA* % of #
Geographies (Census Tracts/BNAs)	44	9.09	29.55	34.09	27.27	0.00
Population by Geography	173,525	5.98	19.35	41.18	33.50	0.00
Owner-Occupied Housing by Geography	50,836	2.41	16.56	42.97	38.06	0.00
Business by Geography	9,841	5.18	25.05	31.97	37.80	0.00
Farms by Geography	266	1.50	12.41	43.61	42.48	0.00
Family Distribution by Income Level	47,176	21.36	17.32	18.83	42.49	0.00
Distribution of Low and Moderate Income Families throughout AA Geographies	18,247	6.74	29.08	43.72	20.46	0.00
Median Family Income FFIEC estimated MFI for 2014 Households Below Poverty Level		49,772 52,700 18%	Median Housing Value Unemployment Rate (2010 US Census)		103,091 2.67%	

(\*) The NA category consists of geographies that have not been assigned an income classification.  
Source: 2010 US Census and 2014 FFIEC estimated MFI

The Huntington-Ashland MSA AA (Huntington AA) includes Cabell, Lincoln and Putnam counties. The Huntington AA operates one banking office, which is a non-traditional in-store office located in the Wal-Mart store. WNB had \$1 million in deposits in this AA as of June 30, 2014 according to FDIC information.

## Employment and Economic Factors

According to the April 2015 U.S. Bureau of Labor Statistics, the Huntington AA had an unemployment rate of 6.2 percent, which is lower than unemployment rate of 7.2 percent for West Virginia.

Rural areas make up the majority of the land in Putnam County. According to the Putnam County 2014 Community Plan, the lack of access to broadband internet has slowed or prevented growth of some residential, educational, and commercial land uses. Expansion in high-speed internet network has diminished. There has been a disconnect between infrastructure and utility improvements in rural areas of the county. Some areas have seen improvement of certain infrastructure or utilities while others remain unavailable at a lower capacity.

The WV Department of Commerce published the significant employers in the AA as Toyota Motor Manufacturing, Babcock & Wilcox Construction Co., Inc., Marshall University, Cabell Huntington Hospital, St. Mary's Medical Center, CSX Transportation, the U.S. Army Corps of Engineers, Amazon, DirecTV, and the city of Huntington. The major employment sectors are education, manufacturing, healthcare, retail and government.

## Housing

According the 2010 Census for 2014, activity within the Huntington AA, 64.12 percent of the housing units are owner occupied, 24.49 percent are renter occupied, and 11.40 percent of the housing units are vacant. According to the Census, the median housing value was \$103,091 and median monthly gross rent was \$600. In addition, 9.94 percent of homeowners and 10.80 percent of renters had home-related costs that exceeded 30.00 percent of their income.

Additionally, 18.97 percent of all owner occupied units and 45.15 percent of renter occupied units were located in LMI CTs. Further, 25.75 percent of all single family (1-4 unit) homes and 48.21 percent multifamily (5+ unit) housing units were located in LMI CTs.

## Competition

Banking competition is intense in this AA. According to FDIC information as of June 30, 2014, the five largest competitors include City NB of WV, Putnam County Bank, Huntington FSB, Branch Banking & Trust Company, and First Sentry Bank, Inc. According to the same FDIC information, WNB is ranked last out of 29 banks in the AA for market share of deposits with a 0.03 percent market share.

## Community Contact

To help identify needs and opportunities, our Community Affairs Officer interviewed a community development organization in the MSA. The organization serves as an affordable mortgage finance agency and identified medical care, financial assistance for utilities, food and clothing, elderly care and affordable rental units as a need in the area. The contact stated that financial institutions have the opportunity to participate in these financial services.

## Appendix D: Tables of Performance Data

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### Content of Standardized Tables

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

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

**Table 1. Lending Volume** - Presents the number and dollar amount of reportable loans originated and purchased by the bank over the evaluation period by MA/assessment area. Community development loans to statewide or regional entities or made outside the bank’s assessment area may receive positive CRA consideration. See Interagency Q&As \_\_.12 (i) - 5 and - 6 for guidance on when a bank may receive positive CRA consideration for such loans. Refer to the CRA section of the Compliance Policy intranet page for guidance on table placement.

**Table 1. Other Products** - Presents the number and dollar amount of any unreported category of loans originated and purchased by the bank, if applicable, over the evaluation period by MA/assessment area. Examples include consumer loans or other data that a bank may provide, at its option, concerning its lending performance. This is a two-page table that lists specific categories.

**Table 2. Geographic Distribution of Home Purchase Loans** - Compares the percentage distribution of the number of loans originated and purchased by the bank in low-, moderate-, middle-, and upper-income geographies to the percentage distribution of owner-occupied housing units throughout those geographies. The table also presents market share information based on the most recent aggregate market data available.

**Table 3. Geographic Distribution of Home Improvement Loans** - See Table 2.

**Table 4. Geographic Distribution of Home Mortgage Refinance Loans** - See Table 2.

**Table 5. Geographic Distribution of Multifamily Loans** - Compares the percentage distribution of the number of multifamily loans originated and purchased by the bank in low-, moderate-, middle-, and upper-income geographies to the percentage distribution of multifamily housing units throughout those geographies. The table also presents market share information based on the most recent aggregate market data available.



**Table 6. Geographic Distribution of Small Loans to Businesses** - The percentage distribution of the number of small loans (less than or equal to \$1 million) to businesses originated and purchased by the bank in low-, moderate-, middle-, and upper-income geographies compared to the percentage distribution of businesses (regardless of revenue size) throughout those geographies. The table also presents market share information based on the most recent aggregate market data available. Because small business data are not available for geographic areas smaller than counties, it may be necessary to use geographic areas larger than the bank's assessment area.

**Table 7. Geographic Distribution of Small Loans to Farms** - The percentage distribution of the number of small loans (less than or equal to \$500,000) to farms originated and purchased by the bank in low-, moderate-, middle-, and upper-income geographies compared to the percentage distribution of farms (regardless of revenue size) throughout those geographies. The table also presents market share information based on the most recent aggregate market data available. Because small farm data are not available for geographic areas smaller than counties, it may be necessary to use geographic areas larger than the bank's assessment area.

**Table 8. Borrower Distribution of Home Purchase Loans** - Compares the percentage distribution of the number of loans originated and purchased by the bank to low-, moderate-, middle-, and upper-income borrowers to the percentage distribution of families by income level in each MA/assessment area. The table also presents market share information based on the most recent aggregate market data available.

**Table 9. Borrower Distribution of Home Improvement Loans** - See Table 8.

**Table 10. Borrower Distribution of Refinance Loans** - See Table 8.

**Table 11. Borrower Distribution of Small Loans to Businesses** - Compares the percentage distribution of the number of small loans (less than or equal to \$1 million) originated and purchased by the bank to businesses with revenues of \$1 million or less to the percentage distribution of businesses with revenues of \$1 million or less. In addition, the table presents the percentage distribution of the number of loans originated and purchased by the bank by loan size, regardless of the revenue size of the business. Market share information is presented based on the most recent aggregate market data available.

**Table 12. Borrower Distribution of Small Loans to Farms** - Compares the percentage distribution of the number of small loans (less than or equal to \$500,000) originated and purchased by the bank to farms with revenues of \$1 million or less to the percentage distribution of farms with revenues of \$1 million or less. In addition, the table presents the percentage distribution of the number of loans originated and purchased by the bank by loan size, regardless of the revenue size of the farm. Market share information is presented based on the most recent aggregate market data available.

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

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

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

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

## Tables of Performance Data

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### Multistate MSAs

Charlotte Multistate MSA  
Chicago Multistate MSA  
Cincinnati Multistate MSA  
Louisville Multistate MSA  
Myrtle Beach Multistate MSA  
Washington Multistate MSA

### State

Texas  
Alabama  
Florida  
Georgia  
Illinois  
Indiana  
Kentucky  
Louisiana  
Maryland  
Mississippi  
New York  
North Carolina  
Ohio  
Pennsylvania  
South Carolina  
Virginia  
West Virginia

Charlotte Multistate MSA

**Table 1. Lending Volume**

LENDING VOLUME		Geography: CHARLOTTE NC-SC						Evaluation Period: JANUARY 1, 2014 TO JUNE 30, 2015					
Assessment Area (2014):	% of Rated Area Loans (#) in MA/AA*	Home Mortgage		Small Loans to Businesses		Small Loans to Farms		Community Development Loans**		Total Reported Loans		% of Rated Area Deposits in MA/AA***	
		#	\$ (000's)	#	\$ (000's)	#	\$ (000's)	#	\$ (000's)	#	\$(000's)		
<b>Full Review:</b>													
2014 Charlotte-Concord-Gastonia NC-SC MSA	100.00	26	2,903	68	443	0	0	11	525	105	3,871	100.00	

**Table 1. Other Products**

LENDING VOLUME		Geography: CHARLOTTE NC-SC						Evaluation Period: JANUARY 1, 2014 TO JUNE 30, 2015						
Assessment Area (2014):	% of Rated Area Loans (#) in MA/AA*	Total Optional Loans**		Small Business Real Estate Secured**		Home Equity**		Motor Vehicle**		Credit Card**		Other Secured Consumer**		% of Rated Area Deposits in AA***
		#	\$ (000's)	#	\$ (000's)	#	\$ (000's)	#	\$ (000's)	#	\$ (000's)	#	\$(000's)	
<b>Full Review:</b>														
2014 Charlotte-Concord-Gastonia NC-SC MSA	100.00	935	1,219	0	0	0	0	0	0	0	0	0	0	100.00

\* Loan Data as of June 30, 2015. Rated area refers to either state or multistate MA rating area.  
 \*\* The evaluation period for Community Development Loans is from January 01, 2014 to July 13, 2015.  
 \*\*\* Deposit Data as of June 30, 2014. Rated Area refers to either the state, multistate MA, or institution, as appropriate.  
 \* Loan Data as of June 30, 2015. Rated area refers to either state or multistate MA rating area.  
 \*\* The evaluation period for Optional Product Line(s) is from January 01, 2014 to June 30, 2014.  
 \*\*\* Deposit Data as of June 30, 2014. Rated Area refers to either the state, multistate MA, or institution, as appropriate.

**Table 1. Other Products**

LENDING VOLUME		Geography: CHARLOTTE NC-SC		Evaluation Period: JANUARY 1, 2014 TO JUNE 30, 2015	
Assessment Area (2014):	Other Unsecured Consumer Loans*		Other Optional Loans*		
	#	\$ (000's)	#	\$ (000's)	
<b>Full Review:</b>					
2014 Charlotte-Concord-Gastonia NC-SC MSA	935	1,219	0	0	

**Table 4. Geographic Distribution of Home Mortgage Refinance Loans**

Geographic Distribution: HOME MORTGAGE REFINANCE		Geography: CHARLOTTE NC-SC								Evaluation Period: JANUARY 1, 2014 TO JUNE 30, 2015					
Assessment Area:	Total Home Mortgage Refinance Loans		Low-Income Geographies		Moderate-Income Geographies		Middle-Income Geographies		Upper-Income Geographies		Market Share (%) by Geography*				
	#	% of Total**	% Owner Occ Units***	% BANK Loans****	% Owner Occ Units***	% BANK Loans	% Owner Occ Units***	% BANK Loans	% Owner Occ Units***	% BANK Loans	Overall	Low	Mod	Mid	Upp
<b>Full Review:</b>															
2014 Charlotte-Concord-Gastonia NC-SC MSA	26	100.00	3.51	7.69	20.07	38.46	39.72	38.46	36.70	15.38	0.12	0.38	0.31	0.12	0.04

\* The evaluation period for Optional Product Line(s) is from January 01, 2014 to June 30, 2015.

\* Based on 2014 Peer Mortgage Data – US and PR

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

\*\*\* Percentage of Owner Occupied Units is the number of owner occupied units in a particular geography divided by the number of owner occupied housing units in the area based on 2010 Census information.

\*\*\*\* Data shown includes only One to Four-family and manufactured housing. (Property type of 1 or 2)

**Table 6. Geographic Distribution of Small Loans to Businesses**

Geographic Distribution: SMALL LOANS TO BUSINESSES			Geography: CHARLOTTE NC-SC				Evaluation Period: JANUARY 1, 2014 TO JUNE 30, 2015					Market Share (%) by Geography*				
Assessment Area:	Total Small Business Loans		Low-Income Geographies		Moderate-Income Geographies		Middle-Income Geographies		Upper-Income Geographies							
	#	% of Total**	% of Businesses***	% BANK Loans	% of Businesses***	% BANK Loans	% of Businesses***	% BANK Loans	% of Businesses***	% BANK Loans	Overall	Low	Mod	Mid	Upp	
<b>Full Review:</b>																
2014 Charlotte-Concord-Gastonia NC-SC MSA	68	100.00	7.63	5.88	18.41	27.94	32.70	38.24	40.38	27.94	0.14	0.03	0.29	0.17	0.09	

**Table 10. Borrower Distribution of Home Mortgage Refinance Loans**

Borrower Distribution: HOME MORTGAGE REFINANCE			Geography: CHARLOTTE NC-SC				Evaluation Period: JANUARY 1, 2014 TO JUNE 30, 2015					Market Share*				
Assessment Area:	Total Home Mortgage Refinance Loans		Low-Income Borrowers		Moderate-Income Borrowers		Middle-Income Borrowers		Upper-Income Borrowers							
	#	% of Total**	% Families***	% BANK Loans****	% Families <sup>7</sup>	% BANK Loans****	% Families***	% BANK Loans****	% Families***	% BANK Loans****	Overall	Low	Mod	Mid	Upp	
<b>Full Review:</b>																
2014 Charlotte-Concord-Gastonia NC-SC MSA	26	100.00	21.30	23.08	17.43	26.92	20.41	7.69	40.86	42.31	0.15	0.52	0.19	0.05	0.12	

\* Based on 2014 Peer Small Business Data – US and PR

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

\*\*\* Source Data - Dun and Bradstreet (2014).

\* Based on 2014 Peer Mortgage Data – US and PR

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

\*\*\* Percentage of Families is based on the 2010 Census information.

\*\*\*\* As a percentage of loans with borrower income information available. No information was available for 0.0% of loans originated and purchased by bank.

<sup>7</sup> Data shown includes only One to Four-family and manufactured housing. (Property type of 1 or 2)

**Table 11. Borrower Distribution of Small Loans to Businesses**

Borrower Distribution: SMALL LOANS TO BUSINESSES		Geography: CHARLOTTE NC-SC				Evaluation Period: JANUARY 1, 2014 TO JUNE 30, 2015			
Assessment Area:	Total Small Loans to Businesses		Businesses With Revenues of \$1 million or less		Loans by Original Amount Regardless of Business Size			Market Share <sup>†</sup>	
	#	% of Total <sup>**</sup>	% of Businesses <sup>***</sup>	% BANK Loans <sup>****</sup>	\$100,000 or less	>\$100,000 to \$250,000	>\$250,000 to \$1,000,000	All	Rev\$ 1 Million or Less
<b>Full Review:</b>									
2014 Charlotte-Concord-Gastonia NC-SC MSA	68	100.00	72.03	89.71	97.06	2.94	0.00	0.14	0.26

**Table 13. Geographic and Borrower Distribution of Consumer Loans**

Geographic and Borrower Distribution: CONSUMER LOANS		Geography: CHARLOTTE NC-SC								Evaluation Period: JANUARY 1, 2014 TO JUNE 30, 2015								
Assessment Area:	Geographic Distribution										Borrower Distribution							
	Total Consumer Loans		Low-Income Geographies		Moderate-Income Geographies		Middle-Income Geographies		Upper-Income Geographies		Low-Income Borrowers		Moderate-Income Borrowers		Middle-Income Borrowers		Upper-Income Borrowers	
	#	% of Total <sup>*</sup>	% of Hhlds <sup>**</sup>	% of BANK Loans	% of Hhlds <sup>**</sup>	% of BANK Loans	% of Hhlds <sup>**</sup>	% of BANK Loans	% of Hhlds <sup>**</sup>	% of BANK Loans	% of Hhlds <sup>**</sup>	% of BANK Loans	% of Hhlds <sup>**</sup>	% of BANK Loans	% of Hhlds <sup>**</sup>	% of BANK Loans	% of Hhlds <sup>**</sup>	% of BANK Loans
<b>Full Review:</b>																		
2014 Charlotte-Concord-Gastonia NC-SC MSA	935	100.00	6.95	7.91	23.72	30.80	37.15	44.60	32.14	16.68	23.16	65.35	16.22	20.43	18.68	8.56	41.94	5.67

\* Based on 2014 Peer Small Business Data --- US and PR

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

\*\*\* Businesses with revenues of \$1 million or less as a percentage of all businesses (Source D&B - 2014).

\*\*\*\* Small loans to businesses with revenues of \$1 million or less as a percentage of all loans reported as small loans to businesses. No information was available for 2.94% of small loans to businesses originated and purchased by the bank.

<sup>†</sup> Consumer Loans originated and purchased in the MA/AA as a percentage of all consumer loans originated and purchased in the rated area.

\*\* Percentage of households is based on 2010 Census Information.

**Table 14. Qualified Investments**

QUALIFIED INVESTMENTS									
Geography: CHARLOTTE NC-SC									
Evaluation Period: JUNE 24, 2012 TO JULY 13, 2015									
Assessment Area:	Prior Period Investments*		Current Period Investments		Total Investments			Unfunded Commitments**	
	#	\$(000's)	#	\$(000's)	#	\$(000's)	% of Total	#	\$(000's)
<b>Full Review:</b>									
2014 Charlotte-Concord-Gastonia NC-SC MSA	5	449	18	2,125	23	2,574	100.00	0	0

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

DISTRIBUTION OF BRANCH DELIVERY SYSTEM AND BRANCH OPENINGS/CLOSINGS																	
Geography: CHARLOTTE NC-SC																	
Evaluation Period: JANUARY 1, 2014 TO JUNE 30, 2015																	
MA/Assessment Area:	Deposits	Branches						Branch Openings/Closings				Population					
	% of Rated Area Deposits in AA	# of BANK Branches	% of Rated Area Branches in AA	Location of Branches by Income of Geographies (%)				# of Branch Openings	# of Branch Closings	Net change in Location of Branches (+ or -)				% of Population within Each Geography			
				Low	Mod	Mid	Upp			Low	Mod	Mid	Upp	Low	Mod	Mid	Upp
<b>Full Review:</b>																	
2014 Charlotte-Concord-Gastonia NC-SC MSA	100.00	18	100.00	0.00	16.66	61.12	22.22	1	0	0	0	0	+1	7.00	23.15	37.27	32.48

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

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



## Chicago Multistate MSA

Table 1. Lending Volume

LENDING VOLUME												
Geography: CHICAGO MULTISTATE												
Evaluation Period: JANUARY 1, 2014 TO JUNE 30, 2015												
Assessment Area (2014):	% of Rated Area Loans (#) in MA/AA*	Home Mortgage		Small Loans to Businesses		Small Loans to Farms		Community Development Loans**		Total Reported Loans		% of Rated Area Deposits in MA/AA***
		#	\$ (000's)	#	\$ (000's)	#	\$ (000's)	#	\$ (000's)	#	\$(000's)	
<b>Full Review:</b>												
2014 Chicago-Naperville-Arlington Heights IL MD	51.66	23	2,753	83	1,606	0	0	3	185	109	4,544	56.06
<b>Limited Review:</b>												
2014 Elgin IL MD	15.64	28	3,907	3	162	0	0	2	125	33	4,194	12.71
2014 Gary IN MD	18.48	36	3,789	2	3	0	0	1	50	39	3,842	17.76
2014 Lake County IL MD	14.22	25	3,450	3	117	0	0	2	125	30	3,692	13.48

\* Loan Data as of June 30, 2015. Rated area refers to either state or multistate MA rating area.

\*\* The evaluation period for Community Development Loans is from January 01, 2014 to July 13, 2015.

\*\*\* Deposit Data as of June 30, 2014. Rated Area refers to either the state, multistate MA, or institution, as appropriate.

**Table 1. Other Products**

LENDING VOLUME		Geography: CHICAGO MULTISTATE						Evaluation Period: JANUARY 1, 2014 TO JUNE 30, 2015						
Assessment Area (2014):	% of Rated Area Loans (#) in MA/AA*	Total Optional Loans**		Small Business Real Estate Secured**		Home Equity**		Motor Vehicle**		Credit Card**		Other Secured Consumer**		% of Rated Area Deposits in AA***
		#	\$ (000's)	#	\$ (000's)	#	\$ (000's)	#	\$ (000's)	#	\$ (000's)	#	\$ (000's)	
<b>Full Review:</b>														
2014 Chicago-Naperville-Arlington Heights IL MD	58.05	303	405	0	0	0	0	0	0	0	0	0	0	56.06
<b>Limited Review:</b>														
2014 Elgin IL MD	10.15	53	60	0	0	0	0	0	0	0	0	0	0	12.71
2014 Gary IN MD	20.31	106	135	0	0	0	0	0	0	0	0	0	0	17.76
2014 Lake County IL MD	11.49	60	74	0	0	0	0	0	0	0	0	0	0	13.48

\* Loan Data as of June 30, 2015. Rated area refers to either state or multistate MA rating area.

\*\* The evaluation period for Optional Product Line(s) is from January 01, 2014 to June 30, 2015.

\*\*\* Deposit Data as of June 30, 2014. Rated Area refers to either the state, multistate MA, or institution, as appropriate.

**Table 1. Other Products**

LENDING VOLUME		Geography: CHICAGO MULTISTATE		Evaluation Period: JANUARY 1, 2014 TO JUNE 30, 2015	
Assessment Area (2014):	Other Unsecured Consumer Loans*		Other Optional Loans*		
	#	\$ (000's)	#	\$ (000's)	
<b>Full Review:</b>					
2014 Chicago-Naperville-Arlington Heights IL MD	303	405	0	0	
<b>Limited Review:</b>					
2014 Elgin IL MD	53	60	0	0	
2014 Gary IN MD	106	135	0	0	
2014 Lake County IL MD	60	74	0	0	

\* The evaluation period for Optional Product Line(s) is from January 01, 2014 to June 30, 2015.

**Table 4. Geographic Distribution of Home Mortgage Refinance Loans**

Geographic Distribution: HOME MORTGAGE REFINANCE			Geography: CHICAGO MULTISTATE				Evaluation Period: JANUARY 1, 2014 TO JUNE 30, 2015					Market Share (%) by Geography*				
Assessment Area:	Total Home Mortgage Refinance Loans		Low-Income Geographies		Moderate-Income Geographies		Middle-Income Geographies		Upper-Income Geographies							
	#	% of Total**	% Owner Occ Units***	% BANK Loans****	% Owner Occ Units***	% BANK Loans	% Owner Occ Units***	% BANK Loans	% Owner Occ Units***	% BANK Loans	Overall	Low	Mod	Mid	Upp	
<b>Full Review:</b>																
2014 Chicago-Naperville-Arlington Heights IL MD	22	20.00	4.19	9.09	16.81	22.73	38.14	31.82	40.86	36.36	0.03	0.10	0.06	0.03	0.02	
<b>Limited Review:</b>																
2014 Elgin IL MD	28	25.45	0.60	3.57	26.19	35.71	42.37	28.57	30.84	32.14	0.39	0.00	0.73	0.28	0.35	
2014 Gary IN MD	35	31.82	4.30	0.00	15.86	17.14	48.98	57.14	30.87	25.71	0.56	0.00	1.05	0.61	0.39	
2014 Lake County IL MD	25	22.73	2.39	4.00	16.16	16.00	37.75	44.00	43.70	36.00	0.29	1.01	0.51	0.38	0.18	

\* Based on 2014 Peer Mortgage Data – US and PR

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

\*\*\* Percentage of Owner Occupied Units is the number of owner occupied units in a particular geography divided by the number of owner occupied housing units in the area based on 2010 Census information.

\*\*\*\* Data shown includes only One to Four-family and manufactured housing. (Property type of 1 or 2)

**Table 6. Geographic Distribution of Small Loans to Businesses**

Geographic Distribution: SMALL LOANS TO BUSINESSES			Geography: CHICAGO MULTISTATE				Evaluation Period: JANUARY 1, 2014 TO JUNE 30, 2015					Market Share (%) by Geography*				
Assessment Area:	Total Small Business Loans		Low-Income Geographies		Moderate-Income Geographies		Middle-Income Geographies		Upper-Income Geographies							
	#	% of Total**	% of Businesses***	% BANK Loans	% of Businesses***	% BANK Loans	% of Businesses***	% BANK Loans	% of Businesses***	% BANK Loans	Overall	Low	Mod	Mid	Upp	
<b>Full Review:</b>																
2014 Chicago-Naperville-Arlington Heights IL MD	83	91.21	4.82	10.84	15.14	30.12	32.43	40.96	47.47	18.07	0.05	0.14	0.09	0.06	0.02	
<b>Limited Review:</b>																
2014 Elgin IL MD	3	3.30	2.68	0.00	21.59	33.33	46.65	33.33	29.09	33.33	0.01	0.00	0.00	0.02	0.00	
2014 Gary IN MD	2	2.20	5.59	0.00	13.76	0.00	49.62	50.00	30.91	50.00	0.01	0.00	0.00	0.03	0.00	
2014 Lake County IL MD	3	3.30	1.58	0.00	12.65	0.00	34.04	66.67	51.71	33.33	0.01	0.00	0.00	0.02	0.00	

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\* Based on 2014 Peer Small Business Data – US and PR.

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

\*\*\* Source Data - Dun and Bradstreet (2014).

**Table 10. Borrower Distribution of Home Mortgage Refinance Loans**

Borrower Distribution: HOME MORTGAGE REFINANCE			Geography: CHICAGO MULTISTATE						Evaluation Period: JANUARY 1, 2014 TO JUNE 30, 2015						
Assessment Area:	Total Home Mortgage Refinance Loans		Low-Income Borrowers		Moderate-Income Borrowers		Middle-Income Borrowers		Upper-Income Borrowers		Market Share*				
	#	% of Total**	% Families***	% BANK Loans****	% Families	% BANK Loans****	% Families***	% BANK Loans****	% Families***	% BANK Loans****	Overall	Low	Mod	Mid	Upp
<b>Full Review:</b>															
2014 Chicago-Naperville-Arlington Heights IL MD	22	20.00	22.74	27.27	16.67	27.27	19.34	27.27	41.25	18.18	0.04	0.17	0.07	0.05	0.01
<b>Limited Review:</b>															
2014 Elgin IL MD	28	25.45	19.70	25.00	18.47	17.86	21.56	21.43	40.28	35.71	0.47	0.84	0.54	0.51	0.36
2014 Gary IN MD	35	31.82	21.06	20.00	17.52	22.86	21.97	34.29	39.45	22.86	0.71	1.50	0.83	0.90	0.37
2014 Lake County IL MD	25	22.73	18.48	16.00	16.77	36.00	21.12	20.00	43.63	28.00	0.35	0.58	0.88	0.43	0.17

\* Based on 2014 Peer Mortgage Data – US and PR

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

\*\*\* Percentage of Families is based on the 2010 Census information.

\*\*\*\* As a percentage of loans with borrower income information available. No information was available for 0.0% of loans originated and purchased by bank.

8 Data shown includes only One to Four-family and manufactured housing. (Property type of 1 or 2)

**Table 11. Borrower Distribution of Small Loans to Businesses**

Borrower Distribution: SMALL LOANS TO BUSINESSES		Geography: CHICAGO MULTISTATE			Evaluation Period: JANUARY 1, 2014 TO JUNE 30, 2015				
Assessment Area:	Total Small Loans to Businesses		Businesses With Revenues of \$1 million or less		Loans by Original Amount Regardless of Business Size			Market Share*	
	#	% of Total**	% of Businesses***	% BANK Loans****	\$100,000 or less	>\$100,000 to \$250,000	>\$250,000 to \$1,000,000	All	Rev\$ 1 Million or Less
<b>Full Review:</b>									
2014 Chicago-Naperville-Arlington Heights IL MD	83	91.21	71.19	85.54	91.57	7.23	1.20	0.05	0.10
<b>Limited Review:</b>									
2014 Elgin IL MD	3	3.30	72.51	66.67	66.67	33.33	0.00	0.01	0.02
2014 Gary IN MD	2	2.20	71.75	100.00	100.00	0.00	0.00	0.01	0.03
2014 Lake County IL MD	3	3.30	73.17	66.67	66.67	33.33	0.00	0.01	0.02

\* Based on 2014 Peer Small Business Data – US and PR

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

\*\*\* Businesses with revenues of \$1 million or less as a percentage of all businesses (Source D&B - 2014).

\*\*\*\* Small loans to businesses with revenues of \$1 million or less as a percentage of all loans reported as small loans to businesses. No information was available for 10.99% of small loans to businesses originated and purchased by the bank.

**Table 13. Geographic and Borrower Distribution of Consumer Loans**

Geographic and Borrower Distribution: CONSUMER LOANS		Geography: CHICAGO MULTISTATE										Evaluation Period: JANUARY 1, 2014 TO JUNE 30, 2015							
Assessment Area:	Geographic Distribution										Borrower Distribution								
	Total Consumer Loans		Low-Income Geographies		Moderate-Income Geographies		Middle-Income Geographies		Upper-Income Geographies		Low-Income Borrowers		Moderate-Income Borrowers		Middle-Income Borrowers		Upper-Income Borrowers		
	#	% of Total*	% of Hhlds**	% of BANK Loans	% of Hhlds**	% of BANK Loans	% of Hhlds**	% of BANK Loans	% of Hhlds**	% of BANK Loans	% of Hhlds**	% of BANK Loans	% of Hhlds**	% of BANK Loans	% of Hhlds**	% of BANK Loans	% of Hhlds**	% of BANK Loans	
<b>Full Review:</b>																			
2014 Chicago-Naperville-Arlington Heights IL MD	303	58.05	8.92	13.86	21.04	28.05	35.36	40.59	34.68	17.49	24.80	67.33	15.70	14.19	17.81	12.21	41.69	6.27	
<b>Limited Review:</b>																			
2014 Elgin IL MD	53	10.15	3.35	1.89	30.45	66.04	40.98	30.19	25.22	1.89	22.01	71.70	17.29	20.75	19.10	3.77	41.60	3.77	
2014 Gary IN MD	106	20.31	7.70	14.15	18.80	21.70	47.77	51.89	25.74	12.26	24.52	65.09	15.82	19.81	18.35	8.49	41.30	6.60	
2014 Lake County IL MD	60	11.49	4.31	3.33	20.11	45.00	37.72	45.00	37.86	6.67	20.62	78.33	16.00	13.33	18.22	5.00	45.16	3.33	

\* Consumer Loans originated and purchased in the MA/AA as a percentage of all consumer loans originated and purchased in the rated area.  
 \*\* Percentage of households is based on 2010 Census Information.



**Table 14. Qualified Investments**

QUALIFIED INVESTMENTS		Geography: CHICAGO MULTISTATE				Evaluation Period: JUNE 24, 2012 TO JULY 13, 2015			
Assessment Area:	Prior Period Investments*		Current Period Investments		Total Investments			Unfunded Commitments**	
	#	\$(000's)	#	\$(000's)	#	\$(000's)	% of Total	#	\$(000's)
<b>Full Review:</b>									
2014 Chicago-Naperville-Arlington Heights IL MD	4	636	21	1,512	25	2,148	43.59	0	0
<b>Limited Review:</b>									
2014 Elgin IL MD	0	0	10	1,252	10	1,252	25.41	0	0
2014 Gary IN MD	0	0	3	352	3	352	7.14	0	0
2014 Lake County IL MD	0	0	7	1,176	7	1,176	23.86	0	0

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

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

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

DISTRIBUTION OF BRANCH DELIVERY SYSTEM AND BRANCH OPENINGS/CLOSINGS																		Geography: CHICAGO MULTISTATE				Evaluation Period: JANUARY 1, 2014 TO JUNE 30, 2015			
MA/Assessment Area:	Deposits	Branches						Branch Openings/Closings						Population											
	% of Rated Area Deposits in AA	# of BANK Branches	% of Rated Area Branches in AA	Location of Branches by Income of Geographies (%)				# of Branch Openings	# of Branch Closings	Net change in Location of Branches (+ or -)				% of Population within Each Geography											
				Low	Mod	Mid	Upp			Low	Mod	Mid	Upp	Low	Mod	Mid	Upp								
<b>Full Review:</b>																									
2014 Chicago-Naperville-Arlington Heights IL MD	56.06	9	56.25	0.00	0.00	33.33	66.67	0	2	0	0	0	-2	9.57	22.44	34.32	33.67								
<b>Limited Review:</b>																									
2014 Elgin IL MD	12.71	1	6.25	0.00	0.00	0.00	100.0	0	1	0	0	0	-1	3.84	32.81	36.99	26.36								
2014 Gary IN MD	17.76	3	18.75	0.00	33.34	33.33	33.33	0	0	0	0	0	0	7.16	18.82	47.10	26.91								
2014 Lake County IL MD	13.48	3	18.75	0.00	0.00	33.33	66.67	0	0	0	0	0	0	4.51	20.72	35.48	38.67								

**Cincinnati Multistate MSA**

**Table 1. Lending Volume**

LENDING VOLUME		Geography: CINCINNATI OH-KY-IN						Evaluation Period: JANUARY 1, 2014 TO JUNE 30, 2015				
Assessment Area (2014):	% of Rated Area Loans (#) in MA/AA*	Home Mortgage		Small Loans to Businesses		Small Loans to Farms		Community Development Loans**		Total Reported Loans		% of Rated Area Deposits in MA/AA***
		#	\$ (000's)	#	\$ (000's)	#	\$ (000's)	#	\$ (000's)	#	\$(000's)	
<b>Full Review:</b>												
2014 Cincinnati OH-KY-IN MSA	100.00	34	3,214	24	38	0	0	2	700	60	3,952	100.00

**Table 1. Other Products**

LENDING VOLUME		Geography: CINCINNATI OH-KY-IN						Evaluation Period: JANUARY 1, 2014 TO JUNE 30, 2015						
Assessment Area (2014):	% of Rated Area Loans (#) in MA/AA*	Total Optional Loans**		Small Business Real Estate Secured**		Home Equity**		Motor Vehicle**		Credit Card**		Other Secured Consumer**		% of Rated Area Deposits in AA***
		#	\$ (000's)	#	\$ (000's)	#	\$ (000's)	#	\$ (000's)	#	\$ (000's)	#	\$(000's)	
<b>Full Review:</b>														
2014 Cincinnati OH-KY-IN MSA	100.00	312	380	0	0	0	0	0	0	0	0	0	0	100.00

\* Loan Data as of June 30, 2015. Rated area refers to either state or multistate MA rating area.

\*\* The evaluation period for Community Development Loans is from January 01, 2014 to July 13, 2015.

\*\*\* Deposit Data as of June 30, 2014. Rated Area refers to either the state, multistate MA, or institution, as appropriate.

\* Loan Data as of June 30, 2015. Rated area refers to either state or multistate MA rating area.

\*\* The evaluation period for Optional Product Line(s) is from January 01, 2014 to June 30, 2015.

\*\*\* Deposit Data as of June 30, 2014. Rated Area refers to either the state, multistate MA, or institution, as appropriate.

**Table 1. Other Products**

LENDING VOLUME		Geography: CINCINNATI OH-KY-IN		Evaluation Period: JANUARY 1, 2014 TO JUNE 30, 2015	
Assessment Area (2014):	Other Unsecured Consumer Loans*		Other Optional Loans*		
	#	\$ (000's)	#	\$ (000's)	
<b>Full Review:</b>					
2014 Cincinnati OH-KY-IN MSA	312	380	0	0	

**Table 4. Geographic Distribution of Home Mortgage Refinance Loans**

Geographic Distribution: HOME MORTGAGE REFINANCE		Geography: CINCINNATI OH-KY-IN				Evaluation Period: JANUARY 1, 2014 TO JUNE 30, 2015									
Assessment Area:	Total Home Mortgage Refinance Loans	Low-Income Geographies		Moderate-Income Geographies		Middle-Income Geographies		Upper-Income Geographies		Market Share (%) by Geography*					
	#	% of Total**	% Owner Occ Units***	% BANK Loans****	% Owner Occ Units***	% BANK Loans	% Owner Occ Units***	% BANK Loans	% Owner Occ Units***	% BANK Loans	Overall	Low	Mod	Mid	Upp
<b>Full Review:</b>															
2014 Cincinnati OH-KY-IN MSA	32	100.00	2.99	12.50	15.55	28.13	46.70	40.63	34.76	18.75	0.16	0.57	0.40	0.14	0.07

\* The evaluation period for Optional Product Line(s) is from January 01, 2014 to June 30, 2015.

\* The evaluation period for Optional Product Line(s) is from January 01, 2014 to June 30, 2015.

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

\*\*\* Percentage of Owner Occupied Units is the number of owner occupied units in a particular geography divided by the number of owner occupied housing units in the area based on 2010 Census information.

\*\*\*\* Data shown includes only One to Four-family and manufactured housing. (Property type of 1 or 2)

**Table 6. Geographic Distribution of Small Loans to Businesses**

Geographic Distribution: SMALL LOANS TO BUSINESSES			Geography: CINCINNATI OH-KY-IN						Evaluation Period: JANUARY 1, 2014 TO JUNE 30, 2015						
Assessment Area:	Total Small Business Loans		Low-Income Geographies		Moderate-Income Geographies		Middle-Income Geographies		Upper-Income Geographies		Market Share (%) by Geography*				
	#	% of Total**	% of Businesses***	% BANK Loans	% of Businesses***	% BANK Loans	% of Businesses***	% BANK Loans	% of Businesses***	% BANK Loans	Overall	Low	Mod	Mid	Upp
<b>Full Review:</b>															
2014 Cincinnati OH-KY-IN MSA	24	100.00	6.02	0.00	20.13	29.17	40.18	58.33	33.65	12.50	0.06	0.00	0.12	0.08	0.02

**Table 10. Borrower Distribution of Home Mortgage Refinance Loans**

Borrower Distribution: HOME MORTGAGE REFINANCE			Geography: CINCINNATI OH-KY-IN						Evaluation Period: JANUARY 1, 2014 TO JUNE 30, 2015						
Assessment Area:	Total Home Mortgage Refinance Loans		Low-Income Borrowers		Moderate-Income Borrowers		Middle-Income Borrowers		Upper-Income Borrowers		Market Share*				
	#	% of Total**	% Families***	% BANK Loans****	% Families <sup>9</sup>	% BANK Loans****	% Families***	% BANK Loans****	% Families***	% BANK Loans****	Overall	Low	Mod	Mid	Upp
<b>Full Review:</b>															
2014 Cincinnati OH-KY-IN MSA	32	100.00	20.87	34.38	17.05	28.13	20.90	18.75	41.18	18.75	0.19	0.78	0.32	0.08	0.06

\* Based on 2014 Peer Small Business Data – US and PR

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

\*\*\* Source Data - Dun and Bradstreet (2014).

\*Based on 2014 Peer Mortgage Data – US and PR

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

\*\*\* Percentage of Families is based on the 2010 Census information.

\*\*\*\* As a percentage of loans with borrower income information available. No information was available for 0.0% of loans originated and purchased by bank.

9 Data shown includes only One to Four-family and manufactured housing. (Property type of 1 or 2)

**Table 11. Borrower Distribution of Small Loans to Businesses**

Borrower Distribution: SMALL LOANS TO BUSINESSES		Geography: CINCINNATI OH-KY-IN				Evaluation Period: JANUARY 1, 2014 TO JUNE 30, 2015			
Assessment Area:	Total Small Loans to Businesses		Businesses With Revenues of \$1 million or less		Loans by Original Amount Regardless of Business Size			Market Share <sup>†</sup>	
	#	% of Total <sup>**</sup>	% of Businesses <sup>***</sup>	% BANK Loans <sup>****</sup>	\$100,000 or less	>\$100,000 to \$250,000	>\$250,000 to \$1,000,000	All	Rev\$ 1 Million or Less
<b>Full Review:</b>									
2014 Cincinnati OH-KY-IN MSA	24	100.00	70.41	100.00	100.00	0.00	0.00	0.06	0.13

**Table 13. Geographic and Borrower Distribution of Consumer Loans**

Geographic and Borrower Distribution: CONSUMER LOANS		Geography: CINCINNATI OH-KY-IN								Evaluation Period: JANUARY 1, 2014 TO JUNE 30, 2015								
Assessment Area:	Geographic Distribution										Borrower Distribution							
	Total Consumer Loans		Low-Income Geographies		Moderate-Income Geographies		Middle-Income Geographies		Upper-Income Geographies		Low-Income Borrowers		Moderate-Income Borrowers		Middle-Income Borrowers		Upper-Income Borrowers	
	#	% of Total <sup>*</sup>	% of Hhlds <sup>**</sup>	% of BANK Loans	% of Hhlds <sup>**</sup>	% of BANK Loans	% of Hhlds <sup>**</sup>	% of BANK Loans	% of Hhlds <sup>**</sup>	% of BANK Loans	% of Hhlds <sup>**</sup>	% of BANK Loans	% of Hhlds <sup>**</sup>	% of BANK Loans	% of Hhlds <sup>**</sup>	% of BANK Loans	% of Hhlds <sup>**</sup>	% of BANK Loans
<b>Full Review:</b>																		
2014 Cincinnati OH-KY-IN MSA	312	100.00	7.12	8.33	20.84	40.06	43.82	44.23	28.22	7.37	24.65	71.15	16.04	18.59	17.45	5.77	41.86	4.49

\* Based on 2014 Peer Small Business Data – US and PR

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

\*\*\* Businesses with revenues of \$1 million or less as a percentage of all businesses (Source D&B - 2014).

\*\*\*\* Small loans to businesses with revenues of \$1 million or less as a percentage of all loans reported as small loans to businesses. No information was available for 0.00% of small loans to businesses originated and purchased by the bank.

† Consumer Loans originated and purchased in the MA/AA as a percentage of all consumer loans originated and purchased in the rated area.

\*\* Percentage of households is based on 2010 Census Information.

**Table 14. Qualified Investments**

QUALIFIED INVESTMENTS									
Geography: CINCINNATI OH-KY-IN									
Evaluation Period: JUNE 24, 2012 TO JULY 13, 2015									
Assessment Area:	Prior Period Investments*		Current Period Investments		Total Investments			Unfunded Commitments**	
	#	\$(000's)	#	\$(000's)	#	\$(000's)	% of Total	#	\$(000's)
<b>Full Review:</b>									
2014 Cincinnati OH-KY-IN MSA	0	0	10	1,037	10	1,037	100.00	0	0

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

DISTRIBUTION OF BRANCH DELIVERY SYSTEM AND BRANCH OPENINGS/CLOSINGS																	
Geography: CINCINNATI OH-KY-IN																	
Evaluation Period: JANUARY 1, 2014 TO JUNE 30, 2015																	
MA/Assessment Area:	Deposits	Branches						Branch Openings/Closings						Population			
	% of Rated Area Deposits in AA	# of BANK Branches	% of Rated Area Branches in AA	Location of Branches by Income of Geographies (%)				# of Branch Openings	# of Branch Closings	Net change in Location of Branches (+ or -)				% of Population within Each Geography			
				Low	Mod	Mid	Upp			Low	Mod	Mid	Upp	Low	Mod	Mid	Upp
<b>Full Review:</b>																	
2014 Cincinnati OH-KY-IN MSA	100.00	10	100.00	0.00	40.00	20.00	40.00	0	0	0	0	0	0	6.99	19.32	42.90	30.12

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

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

**Louisville Multistate MSA**

**Table 1. Lending Volume**

LENDING VOLUME													Geography: LOUISVILLE KY-IN		Evaluation Period: JANUARY 1, 2014 TO JUNE 30, 2015	
Assessment Area (2014):	% of Rated Area Loans (#) in MA/AA*	Home Mortgage		Small Loans to Businesses		Small Loans to Farms		Community Development Loans**		Total Reported Loans		% of Rated Area Deposits in MA/AA***				
		#	\$ (000's)	#	\$ (000's)	#	\$ (000's)	#	\$ (000's)	#	\$(000's)					
<b>Full Review:</b>																
2014 Louisville-Jefferson County KY-IN MSA	100.00	24	2,171	10	331	0	0	1	25	35	2,527	100.00				

**Table 1. Other Products**

LENDING VOLUME													Geography: LOUISVILLE KY-IN		Evaluation Period: JANUARY 1, 2014 TO JUNE 30, 2015	
Assessment Area (2014):	% of Rated Area Loans (#) in MA/AA*	Total Optional Loans**		Small Business Real Estate Secured**		Home Equity**		Motor Vehicle**		Credit Card**		Other Secured Consumer**		% of Rated Area Deposits in AA***		
		#	\$ (000's)	#	\$ (000's)	#	\$ (000's)	#	\$ (000's)	#	\$ (000's)	#	\$(000's)			
<b>Full Review:</b>																
2014 Louisville-Jefferson County KY-IN MSA	100.00	201	240	0	0	0	0	0	0	0	0	0	0	100.00		

\* Loan Data as of June 30, 2015. Rated area refers to either state or multistate MA rating area.  
 \*\* The evaluation period for Community Development Loans is from January 01, 2014 to July 13, 2015.  
 \*\*\* Deposit Data as of June 30, 2014. Rated Area refers to either the state, multistate MA, or institution, as appropriate.  
 \* Loan Data as of June 30, 2015. Rated area refers to either state or multistate MA rating area.  
 \*\* The evaluation period for Optional Product Line(s) is from January 01, 2014 to June 30, 2014.  
 \*\*\* Deposit Data as of June 30, 2014. Rated Area refers to either the state, multistate MA, or institution, as appropriate.



**Table 1. Other Products**

LENDING VOLUME		Geography: LOUISVILLE KY-IN		Evaluation Period: JANUARY 1, 2014 TO JUNE 30, 2015	
Assessment Area (2014):	Other Unsecured Consumer Loans*		Other Optional Loans*		
	#	\$ (000's)	#	\$ (000's)	
<b>Full Review:</b>					
2014 Louisville-Jefferson County KY-IN MSA	201	240	0	0	

**Table 4. Geographic Distribution of Home Mortgage Refinance Loans**

Geographic Distribution: HOME MORTGAGE REFINANCE		Geography: LOUISVILLE KY-IN				Evaluation Period: JANUARY 1, 2014 TO JUNE 30, 2015									
Assessment Area:	Total Home Mortgage Refinance Loans		Low-Income Geographies		Moderate-Income Geographies		Middle-Income Geographies		Upper-Income Geographies		Market Share (%) by Geography*				
	#	% of Total**	% Owner Occ Units***	% BANK Loans****	% Owner Occ Units***	% BANK Loans	% Owner Occ Units***	% BANK Loans	% Owner Occ Units***	% BANK Loans	Overall	Low	Mod	Mid	Upp
<b>Full Review:</b>															
2014 Louisville-Jefferson County KY-IN MSA	24	100.00	6.36	8.33	11.91	29.17	43.38	37.50	38.35	25.00	0.30	0.51	0.82	0.27	0.18

\* The evaluation period for Optional Product Line(s) is from January 01, 2014 to June 30, 2015.

\* Based on 2014 Peer Mortgage Data – US and PR

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

\*\*\* Percentage of Owner Occupied Units is the number of owner occupied units in a particular geography divided by the number of owner occupied housing units in the area based on 2010 Census information.

\*\*\*\* Data shown includes only One to Four-family and manufactured housing. (Property type of 1 or 2)

**Table 6. Geographic Distribution of Small Loans to Businesses**

Geographic Distribution: SMALL LOANS TO BUSINESSES			Geography: LOUISVILLE KY-IN				Evaluation Period: JANUARY 1, 2014 TO JUNE 30, 2015					Market Share (%) by Geography <sup>7</sup>				
Assessment Area:	Total Small Business Loans		Low-Income Geographies		Moderate-Income Geographies		Middle-Income Geographies		Upper-Income Geographies							
	#	% of Total**	% of Businesses***	% BANK Loans	% of Businesses***	% BANK Loans	% of Businesses***	% BANK Loans	% of Businesses***	% BANK Loans	Overall	Low	Mod	Mid	Upp	
<b>Full Review:</b>																
2014 Louisville-Jefferson County KY-IN MSA	10	100.00	13.48	10.00	11.98	10.00	31.79	60.00	42.39	20.00	0.05	0.07	0.06	0.11	0.02	

**Table 10. Borrower Distribution of Home Mortgage Refinance Loans**

Borrower Distribution: HOME MORTGAGE REFINANCE			Geography: LOUISVILLE KY-IN				Evaluation Period: JANUARY 1, 2014 TO JUNE 30, 2015					Market Share <sup>7</sup>				
Assessment Area:	Total Home Mortgage Refinance Loans		Low-Income Borrowers		Moderate-Income Borrowers		Middle-Income Borrowers		Upper-Income Borrowers							
	#	% of Total**	% Families***	% BANK Loans****	% Families <sup>10</sup>	% BANK Loans****	% Families***	% BANK Loans****	% Families***	% BANK Loans****	Overall	Low	Mod	Mid	Upp	
<b>Full Review:</b>																
2014 Louisville-Jefferson County KY-IN MSA	24	100.00	21.85	25.00	16.85	33.33	20.03	29.17	41.27	12.50	0.39	0.82	0.63	0.45	0.11	

\* Based on 2014 Peer Small Business Data – US and PR

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

\*\*\* Source Data - Dun and Bradstreet (2014).

\* Based on 2014 Peer Mortgage Data – US and PR

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

\*\*\* Percentage of Families is based on the 2010 Census information.

\*\*\*\* As a percentage of loans with borrower income information available. No information was available for 0.0% of loans originated and purchased by bank.

10 Data shown includes only One to Four-family and manufactured housing. (Property type of 1 or 2)

**Table 11. Borrower Distribution of Small Loans to Businesses**

Borrower Distribution: SMALL LOANS TO BUSINESSES		Geography: LOUISVILLE KY-IN				Evaluation Period: JANUARY 1, 2014 TO JUNE 30, 2015			
Assessment Area:	Total Small Loans to Businesses		Businesses With Revenues of \$1 million or less		Loans by Original Amount Regardless of Business Size			Market Share <sup>†</sup>	
	#	% of Total <sup>**</sup>	% of Businesses <sup>***</sup>	% BANK Loans <sup>****</sup>	\$100,000 or less	>\$100,000 to \$250,000	>\$250,000 to \$1,000,000	All	Rev\$ 1 Million or Less
<b>Full Review:</b>									
2014 Louisville-Jefferson County KY-IN MSA	10	100.00	70.43	80.00	80.00	20.00	0.00	0.05	0.09

**Table 13. Geographic and Borrower Distribution of Consumer Loans**

Geographic and Borrower Distribution: CONSUMER LOANS		Geography: LOUISVILLE KY-IN								Evaluation Period: JANUARY 1, 2014 TO JUNE 30, 2015								
Assessment Area:	Geographic Distribution										Borrower Distribution							
	Total Consumer Loans		Low-Income Geographies		Moderate-Income Geographies		Middle-Income Geographies		Upper-Income Geographies		Low-Income Borrowers		Moderate-Income Borrowers		Middle-Income Borrowers		Upper-Income Borrowers	
	#	% of Total <sup>*</sup>	% of Hhlds <sup>**</sup>	% of BANK Loans	% of Hhlds <sup>**</sup>	% of BANK Loans	% of Hhlds <sup>**</sup>	% of BANK Loans	% of Hhlds <sup>**</sup>	% of BANK Loans	% of Hhlds <sup>**</sup>	% of BANK Loans	% of Hhlds <sup>**</sup>	% of BANK Loans	% of Hhlds <sup>**</sup>	% of BANK Loans	% of Hhlds <sup>**</sup>	% of BANK Loans
<b>Full Review:</b>																		
2014 Louisville-Jefferson County KY-IN MSA	201	100.00	12.56	17.41	14.83	21.89	40.22	51.74	32.40	8.96	24.59	59.70	16.02	26.37	17.66	8.46	41.72	5.47

\* Based on 2014 Peer Small Business Data – US and PR

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

\*\*\* Businesses with revenues of \$1 million or less as a percentage of all businesses (Source D&B - 2014).

\*\*\*\* Small loans to businesses with revenues of \$1 million or less as a percentage of all loans reported as small loans to businesses. No information was available for 20.00% of small loans to businesses originated and purchased by the bank.

† Consumer Loans originated and purchased in the MA/AA as a percentage of all consumer loans originated and purchased in the rated area.

\*\* Percentage of households is based on 2010 Census Information.

**Table 14. Qualified Investments**

QUALIFIED INVESTMENTS									
Geography: LOUISVILLE KY-IN									
Evaluation Period: JUNE 24, 2012 TO JULY 13, 2015									
Assessment Area:	Prior Period Investments*		Current Period Investments		Total Investments			Unfunded Commitments**	
	#	\$(000's)	#	\$(000's)	#	\$(000's)	% of Total	#	\$(000's)
<b>Full Review:</b>									
2014 Louisville-Jefferson County KY-IN MSA	0	0	10	1,216	10	1,216	100.00	0	0

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

DISTRIBUTION OF BRANCH DELIVERY SYSTEM AND BRANCH OPENINGS/CLOSINGS																	
Geography: LOUISVILLE KY-IN																	
Evaluation Period: JANUARY 1, 2014 TO JUNE 30, 2015																	
MA/Assessment Area:	Deposits	Branches						Branch Openings/Closings				Population					
	% of Rated Area Deposits in AA	# of BANK Branches	% of Rated Area Branches in AA	Location of Branches by Income of Geographies (%)				# of Branch Openings	# of Branch Closings	Net change in Location of Branches (+ or -)				% of Population within Each Geography			
				Low	Mod	Mid	Upp			Low	Mod	Mid	Upp	Low	Mod	Mid	Upp
<b>Full Review:</b>																	
2014 Louisville-Jefferson County KY-IN MSA	100.00	6	100.00	0.00	0.00	83.33	16.67	0	0	0	0	0	0	12.42	14.26	40.55	32.77

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

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

Myrtle Beach Multistate MSA

**Table 1. Lending Volume**

LENDING VOLUME													Geography: MYRTLE BEACH SC-NC				Evaluation Period: JANUARY 1, 2014 TO JUNE 30, 2015			
Assessment Area (2014):	% of Rated Area Loans (#) in MA/AA*	Home Mortgage		Small Loans to Businesses		Small Loans to Farms		Community Development Loans**		Total Reported Loans		% of Rated Area Deposits in MA/AA***								
		#	\$ (000's)	#	\$ (000's)	#	\$ (000's)	#	\$ (000's)	#	\$(000's)									
<b>Full Review:</b>																				
2014 Myrtle Beach-Conway-N Myrtle Beach SC-NC MSA	100.00	27	3,688	22	92	0	0	2	125	51	3,905	100.00								

**Table 1. Other Products**

LENDING VOLUME														Geography: MYRTLE BEACH SC-NC				Evaluation Period: JANUARY 1, 2014 TO JUNE 30, 2015			
Assessment Area (2014):	% of Rated Area Loans (#) in MA/AA*	Total Optional Loans**		Small Business Real Estate Secured**		Home Equity**		Motor Vehicle**		Credit Card**		Other Secured Consumer**		% of Rated Area Deposits in AA***							
		#	\$ (000's)	#	\$ (000's)	#	\$ (000's)	#	\$ (000's)	#	\$ (000's)	#	\$(000's)								
<b>Full Review:</b>																					
2014 Myrtle Beach-Conway-N Myrtle Beach SC-NC MSA	100.00	99	130	0	0	0	0	0	0	0	0	0	0	100.00							

\* Loan Data as of June 30, 2015. Rated area refers to either state or multistate MA rating area.  
 \*\* The evaluation period for Community Development Loans is from January 01, 2014 to July 13, 2015.  
 \*\*\* Deposit Data as of June 30, 2014. Rated Area refers to either the state, multistate MA, or institution, as appropriate.  
 \* Loan Data as of June 30, 2015. Rated area refers to either state or multistate MA rating area.  
 \*\* The evaluation period for Optional Product Line(s) is from January 01, 2014 to June 30, 2014.  
 \*\*\* Deposit Data as of June 30, 2014. Rated Area refers to either the state, multistate MA, or institution, as appropriate.

**Table 1. Other Products**

LENDING VOLUME		Geography: MYRTLE BEACH SC-NC		Evaluation Period: JANUARY 1, 2014 TO JUNE 30, 2015	
Assessment Area (2014):	Other Unsecured Consumer Loans*		Other Optional Loans*		
	#	\$ (000's)	#	\$ (000's)	
<b>Full Review:</b>					
2014 Myrtle Beach-Conway-N Myrtle Beach SC-NC MSA	99	130	0	0	

**Table 4. Geographic Distribution of Home Mortgage Refinance Loans**

Geographic Distribution: HOME MORTGAGE REFINANCE		Geography: MYRTLE BEACH SC-NC				Evaluation Period: JANUARY 1, 2014 TO JUNE 30, 2015									
Assessment Area:	Total Home Mortgage Refinance Loans	Low-Income Geographies		Moderate-Income Geographies		Middle-Income Geographies		Upper-Income Geographies		Market Share (%) by Geography*					
	#	% of Total**	% Owner Occ Units***	% BANK Loans****	% Owner Occ Units***	% BANK Loans	% Owner Occ Units***	% BANK Loans	% Owner Occ Units***	% BANK Loans	Overall	Low	Mod	Mid	Upp
<b>Full Review:</b>															
2014 Myrtle Beach-Conway-N Myrtle Beach SC-NC MSA	25	100.00	0.51	0.00	14.99	12.00	60.95	52.00	23.55	36.00	0.50	0.00	0.71	0.42	0.59

\* The evaluation period for Optional Product Line(s) is from January 01, 2014 to June 30, 2015.

\* Based on 2014 Peer Mortgage Data – US and PR

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

\*\*\* Percentage of Owner Occupied Units is the number of owner occupied units in a particular geography divided by the number of owner occupied housing units in the area based on 2010 Census information.

\*\*\*\* Data shown includes only One to Four-family and manufactured housing. (Property type of 1 or 2)

**Table 6. Geographic Distribution of Small Loans to Businesses**

Geographic Distribution: SMALL LOANS TO BUSINESSES			Geography: MYRTLE BEACH SC-NC						Evaluation Period: JANUARY 1, 2014 TO JUNE 30, 2015						
Assessment Area:	Total Small Business Loans		Low-Income Geographies		Moderate-Income Geographies		Middle-Income Geographies		Upper-Income Geographies		Market Share (%) by Geography*				
	#	% of Total**	% of Businesses***	% BANK Loans	% of Businesses***	% BANK Loans	% of Businesses***	% BANK Loans	% of Businesses***	% BANK Loans	Overall	Low	Mod	Mid	Upp
<b>Full Review:</b>															
2014 Myrtle Beach-Conway-N Myrtle Beach SC-NC MSA	22	100.00	4.19	0.00	14.71	13.64	55.62	68.18	25.00	18.18	0.04	0.00	0.22	0.02	0.00

**Table 10. Borrower Distribution of Home Mortgage Refinance Loans**

Borrower Distribution: HOME MORTGAGE REFINANCE			Geography: MYRTLE BEACH SC-NC						Evaluation Period: JANUARY 1, 2014 TO JUNE 30, 2015						
Assessment Area:	Total Home Mortgage Refinance Loans		Low-Income Borrowers		Moderate-Income Borrowers		Middle-Income Borrowers		Upper-Income Borrowers		Market Share*				
	#	% of Total**	% Families***	% BANK Loans****	% Families <sup>11</sup>	% BANK Loans****	% Families***	% BANK Loans****	% Families***	% BANK Loans****	Overall	Low	Mod	Mid	Upp
<b>Full Review:</b>															
2014 Myrtle Beach-Conway-N Myrtle Beach SC-NC MSA	25	100.00	20.37	12.00	17.58	20.00	21.55	32.00	40.50	36.00	0.61	0.49	0.86	1.10	0.41

\* Based on 2014 Peer Small Business Data – US and PR

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

\*\*\* Source Data - Dun and Bradstreet (2014).

\* The evaluation period for Optional Product Line(s) is from January 01, 2014 to June 30, 2015.

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

\*\*\* Percentage of Families is based on the 2010 Census information.

\*\*\*\* As a percentage of loans with borrower income information available. No information was available for 0.0% of loans originated and purchased by bank.

<sup>11</sup> Data shown includes only One to Four-family and manufactured housing. (Property type of 1 or 2)

**Table 11. Borrower Distribution of Small Loans to Businesses**

Borrower Distribution: SMALL LOANS TO BUSINESSES		Geography: MYRTLE BEACH SC-NC				Evaluation Period: JANUARY 1, 2014 TO JUNE 30, 2015			
Assessment Area:	Total Small Loans to Businesses		Businesses With Revenues of \$1 million or less		Loans by Original Amount Regardless of Business Size			Market Share*	
	#	% of Total**	% of Businesses***	% BANK Loans****	\$100,000 or less	>\$100,000 to \$250,000	>\$250,000 to \$1,000,000	All	Rev\$ 1 Million or Less
<b>Full Review:</b>									
2014 Myrtle Beach-Conway-N Myrtle Beach SC-NC MSA	22	100.00	73.81	100.00	100.00	0.00	0.00	0.04	0.08

**Table 13. Geographic and Borrower Distribution of Consumer Loans**

Geographic and Borrower Distribution: CONSUMER LOANS		Geography: MYRTLE BEACH SC-NC								Evaluation Period: JANUARY 1, 2014 TO JUNE 30, 2015								
Assessment Area:	Geographic Distribution										Borrower Distribution							
	Total Consumer Loans		Low-Income Geographies		Moderate-Income Geographies		Middle-Income Geographies		Upper-Income Geographies		Low-Income Borrowers		Moderate-Income Borrowers		Middle-Income Borrowers		Upper-Income Borrowers	
	#	% of Total*	% of Hhlds**	% of BANK Loans	% of Hhlds**	% of BANK Loans	% of Hhlds**	% of BANK Loans	% of Hhlds**	% of BANK Loans	% of Hhlds**	% of BANK Loans	% of Hhlds**	% of BANK Loans	% of Hhlds**	% of BANK Loans	% of Hhlds**	% of BANK Loans
<b>Full Review:</b>																		
2014 Myrtle Beach-Conway-N Myrtle Beach SC-NC MSA	99	100.00	1.56	0.00	16.03	15.15	61.09	52.53	21.32	32.32	22.57	51.52	17.18	30.30	19.07	12.12	41.18	6.06

\* Based on 2014 Peer Small Business Data – US and PR

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

\*\*\* Businesses with revenues of \$1 million or less as a percentage of all businesses (Source D&B - 2014).

\*\*\*\* Small loans to businesses with revenues of \$1 million or less as a percentage of all loans reported as small loans to businesses. No information was available for 0.00% of small loans to businesses originated and purchased by the bank.

\* Consumer Loans originated and purchased in the MA/AA as a percentage of all consumer loans originated and purchased in the rated area.

\*\* Percentage of households is based on 2010 Census Information.



**Table 14. Qualified Investments**

QUALIFIED INVESTMENTS									
Geography: MYRTLE BEACH SC-NC									
Evaluation Period: JUNE 24, 2012 TO JULY 13, 2015									
Assessment Area:	Prior Period Investments*		Current Period Investments		Total Investments			Unfunded Commitments**	
	#	\$(000's)	#	\$(000's)	#	\$(000's)	% of Total	#	\$(000's)
<b>Full Review:</b>									
2014 Myrtle Beach-Conway-N Myrtle Beach SC-NC MSA	1	114	6	479	7	593	100.00	0	0

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

DISTRIBUTION OF BRANCH DELIVERY SYSTEM AND BRANCH OPENINGS/CLOSINGS																	
Geography: MYRTLE BEACH SC-NC																	
Evaluation Period: JANUARY 1, 2014 TO JUNE 30, 2015																	
MA/Assessment Area:	Deposits	Branches						Branch Openings/Closings				Population					
	% of Rated Area Deposits in AA	# of BANK Branches	% of Rated Area Branches in AA	Location of Branches by Income of Geographies (%)				# of Branch Openings	# of Branch Closings	Net change in Location of Branches (+ or -)				% of Population within Each Geography			
				Low	Mod	Mid	Upp			Low	Mod	Mid	Upp	Low	Mod	Mid	Upp
<b>Full Review:</b>																	
2014 Myrtle Beach-Conway-N Myrtle Beach SC-NC MSA	100.00	3	0.00	0.00	33.33	33.33	33.34	0	0	0	0	0	0	1.69	16.39	60.79	21.10

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

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

Washington Multistate MSA

**Table 1. Lending Volume**

LENDING VOLUME		Geography: WASHINGTON MULTISTATE						Evaluation Period: JANUARY 1, 2014 TO JUNE 30, 2015				
Assessment Area (2014):	% of Rated Area Loans (#) in MA/AA*	Home Mortgage		Small Loans to Businesses		Small Loans to Farms		Community Development Loans**		Total Reported Loans		% of Rated Area Deposits in MA/AA***
		#	\$ (000's)	#	\$ (000's)	#	\$ (000's)	#	\$ (000's)	#	\$(000's)	
<b>Full Review:</b>												
2014 Washington-Arlington-Alexandria VA-MD MD	68.92	29	4,595	19	712	0	0	3	300	51	5,607	92.86
<b>Limited Review:</b>												
2014 Silver Spring-Frederick-Rockville MD MD	31.08	22	3,814	1	1	0	0	0	0	23	3,815	7.14

**Table 1. Other Products**

LENDING VOLUME		Geography: WASHINGTON MULTISTATE						Evaluation Period: JANUARY 1, 2014 TO JUNE 30, 2015						
Assessment Area (2014):	% of Rated Area Loans (#) in MA/AA*	Total Optional Loans**		Small Business Real Estate Secured**		Home Equity**		Motor Vehicle**		Credit Card**		Other Secured Consumer**		% of Rated Area Deposits in AA***
		#	\$ (000's)	#	\$ (000's)	#	\$ (000's)	#	\$ (000's)	#	\$ (000's)	#	\$(000's)	
<b>Full Review:</b>														
2014 Washington-Arlington-Alexandria VA-MD MD	89.72	192	261	0	0	0	0	0	0	0	0	0	0	92.86
<b>Limited Review:</b>														
2014 Silver Spring-Frederick-Rockville MD MD	10.28	22	26	0	0	0	0	0	0	0	0	0	0	7.14

\* Loan Data as of June 30, 2015. Rated area refers to either state or multistate MA rating area.  
 \*\* The evaluation period for Community Development Loans is from January 01, 2014 to July 13, 2015.  
 \*\*\* Deposit Data as of June 30, 2014. Rated Area refers to either the state, multistate MA, or institution, as appropriate.  
 \* Loan Data as of June 30, 2015. Rated area refers to either state or multistate MA rating area.  
 \*\* The evaluation period for Optional Product Line(s) is from January 01, 2014 to June 30, 2015.  
 \*\*\* Deposit Data as of June 30, 2014. Rated Area refers to either the state, multistate MA, or institution, as appropriate.

**Table 1. Other Products**

LENDING VOLUME		Geography: WASHINGTON MULTISTATE		Evaluation Period: JANUARY 1, 2014 TO JUNE 30, 2015	
Assessment Area (2014):	Other Unsecured Consumer Loans*		Other Optional Loans*		
	#	\$ (000's)	#	\$ (000's)	
<b>Full Review:</b>					
2014 Washington-Arlington-Alexandria VA-MD MD	192	261	0	0	
<b>Limited Review:</b>					
2014 Silver Spring-Frederick-Rockville MD MD	22	26	0	0	

**Table 4. Geographic Distribution of Home Mortgage Refinance Loans**

Geographic Distribution: HOME MORTGAGE REFINANCE		Geography: WASHINGTON MULTISTATE				Evaluation Period: JANUARY 1, 2014 TO JUNE 30, 2015									
Assessment Area:	Total Home Mortgage Refinance Loans		Low-Income Geographies		Moderate-Income Geographies		Middle-Income Geographies		Upper-Income Geographies		Market Share (%) by Geography*				
	#	% of Total**	% Owner Occ Units***	% BANK Loans****	% Owner Occ Units***	% BANK Loans	% Owner Occ Units***	% BANK Loans	% Owner Occ Units***	% BANK Loans	Overall	Low	Mod	Mid	Upp
<b>Full Review:</b>															
2014 Washington-Arlington-Alexandria VA-MD MD	28	56.00	2.28	10.71	18.09	21.43	40.97	57.14	38.66	10.71	0.06	0.36	0.08	0.08	0.01
<b>Limited Review:</b>															
2014 Silver Spring-Frederick-Rockville MD MD	22	44.00	3.05	13.64	22.99	45.45	41.19	31.82	32.76	9.09	0.15	0.78	0.33	0.12	0.04

\* The evaluation period for Optional Product Line(s) is from January 01, 2014 to June 30, 2015.

\*\* Based on 2014 Peer Mortgage Data – US and PR

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

\*\*\*\* Percentage of Owner Occupied Units is the number of owner occupied units in a particular geography divided by the number of owner occupied housing units in the area based on 2010 Census information.

\*\*\*\*\* Data shown includes only One to Four-family and manufactured housing. (Property type of 1 or 2)

**Table 6. Geographic Distribution of Small Loans to Businesses**

Geographic Distribution: SMALL LOANS TO BUSINESSES		Geography: WASHINGTON MULTISTATE						Evaluation Period: JANUARY 1, 2014 TO JUNE 30, 2015							
Assessment Area:	Total Small Business Loans		Low-Income Geographies		Moderate-Income Geographies		Middle-Income Geographies		Upper-Income Geographies		Market Share (%) by Geography*				
	#	% of Total**	% of Businesses***	% BANK Loans	% of Businesses***	% BANK Loans	% of Businesses***	% BANK Loans	% of Businesses***	% BANK Loans	Overall	Low	Mod	Mid	Upp
<b>Full Review:</b>															
2014 Washington-Arlington-Alexandria VA-MD MD	19	95.00	2.94	0.00	16.78	15.79	39.91	63.16	40.20	21.05	0.02	0.00	0.02	0.02	0.01
<b>Limited Review:</b>															
2014 Silver Spring-Frederick-Rockville MD	1	5.00	3.81	0.00	27.67	0.00	33.27	100.00	35.25	0.00	0.00	0.00	0.00	0.01	0.00

\* Based on 2014 Peer Small Business Data – US and PR

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

\*\*\* Source Data - Dun and Bradstreet (2014).

**Table 10. Borrower Distribution of Home Mortgage Refinance Loans**

Borrower Distribution: HOME MORTGAGE REFINANCE				Geography: WASHINGTON MULTISTATE				Evaluation Period: JANUARY 1, 2014 TO JUNE 30, 2015							
Assessment Area:	Total Home Mortgage Refinance Loans		Low-Income Borrowers		Moderate-Income Borrowers		Middle-Income Borrowers		Upper-Income Borrowers		Market Share*				
	#	% of Total**	% Families***	% BANK Loans****	% Families <sup>12</sup>	% BANK Loans****	% Families***	% BANK Loans****	% Families***	% BANK Loans****	Overall	Low	Mod	Mid	Upp
<b>Full Review:</b>															
2014 Washington-Arlington-Alexandria VA-MD MD	28	56.00	18.99	28.57	17.49	42.86	21.70	21.43	41.82	7.14	0.08	0.29	0.16	0.04	0.01
<b>Limited Review:</b>															
2014 Silver Spring-Frederick-Rockville MD MD	22	44.00	20.78	27.27	17.55	31.82	21.88	22.73	39.78	18.18	0.18	0.59	0.30	0.10	0.08

\* Based on 2014 Peer Mortgage Data – US and PR

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

\*\*\* Percentage of Families is based on the 2010 Census information.

\*\*\*\* As a percentage of loans with borrower income information available. No information was available for 0.0% of loans originated and purchased by bank.

<sup>12</sup> Data shown includes only One to Four-family and manufactured housing. (Property type of 1 or 2)

**Table 11. Borrower Distribution of Small Loans to Businesses**

Borrower Distribution: SMALL LOANS TO BUSINESSES		Geography: WASHINGTON MULTISTATE			Evaluation Period: JANUARY 1, 2014 TO JUNE 30, 2015				
Assessment Area:	Total Small Loans to Businesses		Businesses With Revenues of \$1 million or less		Loans by Original Amount Regardless of Business Size			Market Share*	
	#	% of Total**	% of Businesses***	% BANK Loans****	\$100,000 or less	>\$100,000 to \$250,000	>\$250,000 to \$1,000,000	All	Rev\$ 1 Million or Less
<b>Full Review:</b>									
2014 Washington-Arlington-Alexandria VA-MD MD	19	95.00	71.98	52.63	84.21	15.79	0.00	0.02	0.02
<b>Limited Review:</b>									
2014 Silver Spring-Frederick-Rockville MD MD	1	5.00	72.83	100.00	100.00	0.00	0.00	0.00	0.00

\* Based on 2014 Peer Small Business Data – US and PR

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

\*\*\* Businesses with revenues of \$1 million or less as a percentage of all businesses (Source D&B - 2014).

\*\*\*\* Small loans to businesses with revenues of \$1 million or less as a percentage of all loans reported as small loans to businesses. No information was available for 35.00% of small loans to businesses originated and purchased by the bank.

**Table 13. Geographic and Borrower Distribution of Consumer Loans**

Geographic and Borrower Distribution: CONSUMER LOANS																			Geography: WASHINGTON MULTISTATE				Evaluation Period: JANUARY 1, 2014 TO JUNE 30, 2015			
Assessment Area:	Geographic Distribution										Borrower Distribution															
	Total Consumer Loans		Low-Income Geographies		Moderate-Income Geographies		Middle-Income Geographies		Upper-Income Geographies		Low-Income Borrowers		Moderate-Income Borrowers		Middle-Income Borrowers		Upper-Income Borrowers									
	#	% of Total*	% of Hhlds**	% of BANK Loans	% of Hhlds**	% of BANK Loans	% of Hhlds**	% of BANK Loans	% of Hhlds**	% of BANK Loans	% of Hhlds**	% of BANK Loans	% of Hhlds**	% of BANK Loans	% of Hhlds**	% of BANK Loans	% of Hhlds**	% of BANK Loans								
<b>Full Review:</b>																										
2014 Washington-Arlington-Alexandria VA-MD MD	192	89.72	5.61	6.77	23.17	44.27	39.09	41.15	32.10	7.81	18.74	77.60	16.94	14.06	19.92	5.73	44.40	2.60								
<b>Limited Review:</b>																										
2014 Silver Spring-Frederick-Rockville MD MD	22	10.28	5.81	18.18	29.85	45.45	37.35	36.36	27.00	0.00	22.18	90.91	17.35	9.09	19.41	0.00	41.06	0.00								

\* Consumer Loans originated and purchased in the MA/AA as a percentage of all consumer loans originated and purchased in the rated area.  
 \*\* Percentage of households is based on 2010 Census Information.

**Table 14. Qualified Investments**

QUALIFIED INVESTMENTS		Geography: WASHINGTON MULTISTATE				Evaluation Period: JUNE 24, 2012 TO JULY 13, 2015			
Assessment Area:	Prior Period Investments*		Current Period Investments		Total Investments			Unfunded Commitments**	
	#	\$(000's)	#	\$(000's)	#	\$(000's)	% of Total	#	\$(000's)
<b>Full Review:</b>									
2014 Washington-Arlington-Alexandria VA-MD MD	1	254	6	679	7	933	84.21	0	0
<b>Limited Review:</b>									
2014 Silver Spring-Frederick-Rockville MD MD	0	0	1	175	1	175	15.79	0	0

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

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



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

DISTRIBUTION OF BRANCH DELIVERY SYSTEM AND BRANCH OPENINGS/CLOSINGS																	
Geography: WASHINGTON MULTISTATE																	
Evaluation Period: JANUARY 1, 2014 TO JUNE 30, 2015																	
MA/Assessment Area:	Deposits	Branches						Branch Openings/Closings						Population			
	% of Rated Area Deposits in AA	# of BANK Branches	% of Rated Area Branches in AA	Location of Branches by Income of Geographies (%)				# of Branch Openings	# of Branch Closings	Net change in Location of Branches (+ or -)				% of Population within Each Geography			
				Low	Mod	Mid	Upp			Low	Mod	Mid	Upp	Low	Mod	Mid	Upp
<b>Full Review:</b>																	
2014 Washington-Arlington-Alexandria VA-MD MD	92.29	8	88.89	0.00	37.50	62.50	0.00	0	1	0	0	-1	0	5.53	22.97	38.44	32.99
<b>Limited Review:</b>																	
2014 Silver Spring-Frederick-Rockville MD	7.71	1	11.11	0.00	100.00	0.00	0.00	0	0	0	0	0	0	6.10	28.33	37.49	28.08

## Texas

Table 1. Lending Volume

LENDING VOLUME		Geography: TEXAS				Evaluation Period: JANUARY 1, 2014 TO JUNE 30, 2015						
Assessment Area (2014):	% of Rated Area Loans (#) in MA/AA*	Home Mortgage		Small Loans to Businesses		Small Loans to Farms		Community Development Loans**		Total Reported Loans		% of Rated Area Deposits in MA/AA***
		#	\$ (000's)	#	\$ (000's)	#	\$ (000's)	#	\$ (000's)	#	\$(000's)	
<b>Full Review:</b>												
2014 Houston-The Woodlands-Sugar Land TX MSA	63.24	628	125,872	1,020	61,776	0	0	14	38,087	1,662	225,735	91.20
2014 San Antonio-New Braunfels TX MSA	6.89	28	2,250	151	2,313	0	0	1	5,425	180	9,988	1.12
<b>Limited Review:</b>												
2014 Amarillo TX MSA	1.29	28	2,502	4	13	0	0	2	62	34	2,577	0.14
2014 Austin-Round Rock TX MSA	4.87	32	4,106	93	1,322	0	0	3	44	128	5,472	0.95
2014 Beaumont-Port Arthur TX MSA	1.33	25	2,568	6	96	0	0	4	11	35	2,675	0.18
2014 Brownsville-Harlingen TX MSA	1.37	23	2,229	11	274	0	0	2	21	36	2,524	0.05
2014 Cooke County TX	0.15	2	272	0	0	0	0	2	23	4	295	0.05
2014 Dallas-Plano-Irving TX MD	8.37	51	5,139	164	2,773	0	0	5	12	220	7,924	2.15
2014 East Texas Non-MSA TX	2.09	28	2,919	26	76	0	0	1	1,850	55	4,845	0.99
2014 Fort Worth-Arlington TX MD	2.97	35	3,457	42	915	0	0	1	5,000	78	9,372	1.45
2014 Gillespie County TX	0.19	1	104	2	4	0	0	2	33	5	141	0.10
2014 Harrison County TX	0.42	2	282	6	16	0	0	3	61	11	359	0.14
2014 Howard County TX	0.23	1	10	2	6	0	0	3	46	6	62	0.11
2014 Longview TX MSA	1.37	22	2,270	12	30	0	0	2	61	36	2,366	0.18
2014 Northeast Non-MSA TX	0.65	4	325	11	21	0	0	2	61	17	407	0.15
2014 Shelby County TX	0.23	1	160	3	9	0	0	2	35	6	204	0.09
2014 Sherman-Denison TX MSA	0.99	20	2,367	5	97	0	0	1	744	26	3,208	0.10
2014 Southeast Non-MSA TX	1.29	21	2,410	11	32	0	0	2	109	34	2,551	0.25
2014 Southern Non-MSA TX	0.42	3	267	7	14	0	0	1	500	11	781	0.25

\* Loan Data as of June 30, 2015. Rated area refers to either state or multistate MA rating area.

\*\* The evaluation period for Community Development Loans is from January 01, 2014 to July 13, 2015.

\*\*\* Deposit Data as of June 30, 2014. Rated Area refers to either the state, multistate MA, or institution, as appropriate.

**Table 1. Lending Volume**

LENDING VOLUME		Geography: TEXAS				Evaluation Period: JANUARY 1, 2014 TO JUNE 30, 2015						
Assessment Area (2014):	% of Rated Area Loans (#) in MA/AA*	Home Mortgage		Small Loans to Businesses		Small Loans to Farms		Community Development Loans**		Total Reported Loans		% of Rated Area Deposits in MA/AA***
		#	\$ (000's)	#	\$ (000's)	#	\$ (000's)	#	\$ (000's)	#	\$ (000's)	
<b>Limited Review:</b>												
2014 Texarkana TX MSA	0.38	5	429	4	10	0	0	1	500	10	939	0.05
2014 Tyler TX MSA	1.26	25	3,387	6	26	0	0	2	40	33	3,453	0.09

\*The Austin MSA, Amarillo MSA, Beaumont MSA, Brownsville/Harlingen MSA AAs were added for 2014/2015 due to demographic changes.

\* Loan Data as of June 30, 2015. Rated area refers to either state or multistate MA rating area.

\*\* The evaluation period for Community Development Loans is from January 01, 2014 to July 13, 2015.

\*\*\* Deposit Data as of June 30, 2014. Rated Area refers to either the state, multistate MA, or institution, as appropriate.

Table 1. Other Products

LENDING VOLUME		Geography: TEXAS				Evaluation Period: JANUARY 1, 2014 TO JUNE 30, 2015								
Assessment Area (2014):	% of Rated Area Loans (#) in MA/AA*	Total Optional Loans**		Small Business Real Estate Secured**		Home Equity**		Motor Vehicle**		Credit Card**		Other Secured Consumer**		% of Rated Area Deposits in AA***
		#	\$ (000's)	#	\$ (000's)	#	\$ (000's)	#	\$ (000's)	#	\$ (000's)	#	\$ (000's)	
<b>Full Review:</b>														
2014 Houston-The Woodlands-Sugar Land TX MSA	51.50	3,490	13,616	0	0	0	0	0	0	0	0	0	0	91.20
2014 San Antonio-New Braunfels TX MSA	9.52	645	864	0	0	0	0	0	0	0	0	0	0	1.12
<b>Limited Review:</b>														
2014 Amarillo TX MSA	1.03	70	94	0	0	0	0	0	0	0	0	0	0	0.14
2014 Austin-Round Rock TX	5.89	399	564	0	0	0	0	0	0	0	0	0	0	0.95
2014 Beaumont-Port Arthur TX	0.71	48	70	0	0	0	0	0	0	0	0	0	0	0.18
2014 Brownsville-Harlingen TX	1.02	69	96	0	0	0	0	0	0	0	0	0	0	0.05
2014 Cooke County TX	0.37	25	32	0	0	0	0	0	0	0	0	0	0	0.05
2014 Dallas-Plano-Irving TX	9.58	649	949	0	0	0	0	0	0	0	0	0	0	2.15
2014 East Texas Non-MSA TX	3.42	232	329	0	0	0	0	0	0	0	0	0	0	0.99
2014 Fort Worth-Arlington TX	6.09	413	589	0	0	0	0	0	0	0	0	0	0	1.45
2014 Gillespie County TX	0.35	24	39	0	0	0	0	0	0	0	0	0	0	0.10
2014 Harrison County TX	1.39	94	138	0	0	0	0	0	0	0	0	0	0	0.14
2014 Howard County TX	0.49	33	45	0	0	0	0	0	0	0	0	0	0	0.11

\* Loan Data as of June 30, 2015. Rated area refers to either state or multistate MA rating area.

\*\* The evaluation period for Optional Product Line(s) is from January 01, 2014 to June 30, 2015.

\*\*\* Deposit Data as of June 30, 2014. Rated Area refers to either the state, multistate MA, or institution, as appropriate.

Table 1. Other Products

LENDING VOLUME		Geography: TEXAS				Evaluation Period: JANUARY 1, 2014 TO JUNE 30, 2015								
Assessment Area (2014):	% of Rated Area Loans (#) in MA/AA*	Total Optional Loans**		Small Business Real Estate Secured**		Home Equity**		Motor Vehicle**		Credit Card**		Other Secured Consumer**		% of Rated Area Deposits in AA***
		#	\$ (000's)	#	\$ (000's)	#	\$ (000's)	#	\$ (000's)	#	\$ (000's)	#	\$ (000's)	
<b>Limited Review:</b>														
2014 Longview TX MSA	1.22	83	110	0	0	0	0	0	0	0	0	0	0	0.18
2014 Northeast Non-MSA TX	2.04	138	188	0	0	0	0	0	0	0	0	0	0	0.15
2014 Shelby County TX	0.43	29	38	0	0	0	0	0	0	0	0	0	0	0.09
2014 Sherman-Denison TX	0.74	50	73	0	0	0	0	0	0	0	0	0	0	0.10
2014 Southeast Non-MSA TX	1.34	91	180	0	0	0	0	0	0	0	0	0	0	0.25
2014 Southern Non-MSA	1.31	89	121	0	0	0	0	0	0	0	0	0	0	0.46
2014 Texarkana TX MSA	0.58	39	52	0	0	0	0	0	0	0	0	0	0	0.05
2014 Tyler TX MSA	0.99	67	87	0	0	0	0	0	0	0	0	0	0	0.09

\* Loan Data as of June 30, 2015. Rated area refers to either state or multistate MA rating area.

\*\* The evaluation period for Optional Product Line(s) is from January 01, 2014 to June 30, 2015.

\*\*\* Deposit Data as of June 30, 2014. Rated Area refers to either the state, multistate MA, or institution, as appropriate.

**Table 1. Other Products**

LENDING VOLUME	Geography: TEXAS		Evaluation Period: JANUARY 1, 2014 TO JUNE 30, 2015	
Assessment Area (2014):	Other Unsecured Consumer Loans*		Other Optional Loans*	
	#	\$ (000's)	#	\$ (000's)
<b>Full Review:</b>				
2014 Houston-The Woodlands-Sugar Land TX MSA	3,490	13,616	0	0
2014 San Antonio-New Braunfels TX MSA	645	864	0	0
<b>Limited Review:</b>				
2014 Amarillo TX MSA	70	94	0	0
2014 Austin-Round Rock TX MSA	399	564	0	0
2014 Beaumont-Port Arthur TX MSA	48	70	0	0
2014 Brownsville-Harlingen TX MSA	69	96	0	0
2014 Cooke County TX	25	32	0	0
2014 Dallas-Plano-Irving TX MD	649	949	0	0
2014 East Texas Non-MSA TX	232	329	0	0
2014 Fort Worth-Arlington TX MD	413	589	0	0
2014 Gillespie County TX	24	39	0	0
2014 Harrison County TX	94	138	0	0
2014 Howard County TX	33	45	0	0
2014 Longview TX MSA	83	110	0	0
2014 Northeast Non-MSA TX	138	188	0	0
2014 Shelby County TX	29	38	0	0
2014 Sherman-Denison TX MSA	50	73	0	0
2014 Southeast Non-MSA TX	91	180	0	0
2014 Southern Non-MSA TX	89	121	0	0
2014 Texarkana TX MSA	39	52	0	0
2014 Tyler TX MSA	67	87	0	0

\* The evaluation period for Optional Product Line(s) is from January 01, 2014 to June 30, 2015.

**Table 2. Geographic Distribution of Home Purchase Loans**

Geographic Distribution: HOME PURCHASE			Geography: TEXAS				Evaluation Period: JANUARY 1, 2014 TO JUNE 30, 2015					Market Share (%) by Geography*				
Assessment Area:	Total Home Purchase Loans		Low-Income Geographies		Moderate-Income Geographies		Middle-Income Geographies		Upper-Income Geographies							
	#	% of Total**	% Owner Occ Units***	% BANK Loans****	% Owner Occ Units***	% BANK Loans	% Owner Occ Units***	% BANK Loans	% Owner Occ Units***	% BANK Loans	Overall	Low	Mod	Mid	Upp	
<b>Full Review:</b>																
2014 Houston-The Woodlands-Sugar Land TX MSA	328	97.91	4.07	2.74	21.17	20.73	30.33	24.39	44.43	52.13	0.25	0.56	0.52	0.22	0.21	
2014 San Antonio-New Braunfels TX MSA	1	0.30	4.79	0.00	24.08	0.00	34.59	100.00	36.54	0.00	0.00	0.00	0.00	0.01	0.00	
<b>Limited Review:</b>																
2014 Amarillo TX MSA	0	0.00	7.55	0.00	15.74	0.00	39.34	0.00	37.38	0.25	0.00	0.00	0.00	0.00	0.00	
2014 Austin-Round Rock TX MSA	1	0.30	4.38	0.00	17.54	0.00	38.78	100.00	39.30	0.00	0.00	0.00	0.00	0.00	0.00	
2014 Beaumont-Port Arthur TX MSA	1	0.30	4.03	0.00	27.85	100.00	33.03	0.00	35.10	0.00	0.04	0.00	0.41	0.00	0.00	
2014 Brownsville-Harlingen TX MSA	0	0.00	0.98	0.00	23.63	0.00	47.56	0.00	27.84	0.00	0.00	0.00	0.00	0.00	0.00	
2014 Cooke County TX	0	0.00	0.00	0.00	5.20	0.00	43.87	0.00	50.93	0.00	0.00	0.00	0.00	0.00	0.00	
2014 Dallas-Plano-Irving TX MD	3	0.90	5.45	0.00	19.40	33.33	27.57	33.33	47.58	33.33	0.00	0.00	0.01	0.00	0.00	
2014 East Texas Non-MSA TX	0	0.00	0.00	0.00	8.68	0.00	75.91	0.00	15.42	0.00	0.00	0.00	0.00	0.00	0.00	
2014 Fort Worth-Arlington TX MD	0	0.00	3.86	0.00	20.38	0.00	39.32	0.00	36.44	0.00	0.00	0.00	0.00	0.00	0.00	
2014 Gillespie County TX	0	0.00	0.00	0.00	0.00	0.00	32.07	0.00	67.93	0.00	0.00	0.00	0.00	0.00	0.00	
2014 Harrison County TX	0	0.00	0.00	0.00	12.39	0.00	33.21	0.00	54.40	0.00	0.00	0.00	0.00	0.00	0.00	
2014 Howard County TX	0	0.00	0.00	0.00	22.14	0.00	51.26	0.00	26.61	0.00	0.00	0.00	0.00	0.00	0.00	

\* Based on 2014 Peer Mortgage Data – US and PR

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

\*\*\* Percentage of Owner Occupied Units is the number of owner occupied units in a particular geography divided by the number of owner occupied housing units in the area based on 2010 Census information.

\*\*\*\* Data shown includes only One to Four-family and manufactured housing. (Property type of 1 or 2)

**Table 2. Geographic Distribution of Home Purchase Loans**

Geographic Distribution: HOME PURCHASE			Geography: TEXAS				Evaluation Period: JANUARY 1, 2014 TO JUNE 30, 2015					Market Share (%) by Geography <sup>†</sup>				
Assessment Area:	Total Home Purchase Loans		Low-Income Geographies		Moderate-Income Geographies		Middle-Income Geographies		Upper-Income Geographies		Overall	Low	Mod	Mid	Upp	
	#	% of Total**	% Owner Occ Units***	% BANK Loans****	% Owner Occ Units***	% BANK Loans	% Owner Occ Units***	% BANK Loans	% Owner Occ Units***	% BANK Loans						
<b>Limited Review:</b>																
2014 Longview TX MSA	0	0.00	1.17	0.00	15.82	0.00	60.71	0.00	22.30	0.00	0.00	0.00	0.00	0.00	0.00	
2014 Northeast Non-MSA TX	0	0.00	0.00	0.00	18.63	0.00	78.05	0.00	3.32	0.00	0.00	0.00	0.00	0.00	0.00	
2014 Shelby County TX	0	0.00	0.00	0.00	17.01	0.00	82.99	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	
2014 Sherman-Denison TX MSA	0	0.00	0.00	0.00	23.02	0.00	57.35	0.00	19.64	0.00	0.00	0.00	0.00	0.00	0.00	
2014 Southeast Non-MSA TX	0	0.00	0.00	0.00	3.57	0.00	53.19	0.00	43.24	0.00	0.00	0.00	0.00	0.00	0.00	
2014 Southern Non-MSA TX	1	0.30	0.00	0.00	13.46	0.00	57.08	100.00	29.46	0.00	0.19	0.00	0.00	0.33	0.00	
2014 Texarkana TX MSA	0	0.00	1.13	0.00	5.11	0.00	63.33	0.00	30.43	0.00	0.00	0.00	0.00	0.00	0.00	
2014 Tyler TX MSA	0	0.00	1.20	0.00	21.75	0.00	42.20	0.00	34.85	0.00	0.00	0.00	0.00	0.00	0.00	

\* Based on 2014 Peer Mortgage Data – US and PR

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

\*\*\* Percentage of Owner Occupied Units is the number of owner occupied units in a particular geography divided by the number of owner occupied housing units in the area based on 2010 Census information.

\*\*\*\* Data shown includes only One to Four-family and manufactured housing. (Property type of 1 or 2)



**Table 3. Geographic Distribution of Home Improvement Loans**

Geographic Distribution: HOME IMPROVEMENT			Geography: TEXAS				Evaluation Period: JANUARY 1, 2014 TO JUNE 30, 2015					Market Share (%) by Geography <sup>7</sup>				
Assessment Area:	Total Home Improvement Loans		Low-Income Geographies		Moderate-Income Geographies		Middle-Income Geographies		Upper-Income Geographies		Overall	Low	Mod	Mid	Upp	
	#	% of Total <sup>**</sup>	% Owner Occ Units <sup>***</sup>	% BANK Loans <sup>****</sup>	% Owner Occ Units <sup>***</sup>	% BANK Loans	% Owner Occ Units <sup>***</sup>	% BANK Loans	% Owner Occ Units <sup>***</sup>	% BANK Loans						
<b>Full Review:</b>																
2014 Houston-The Woodlands-Sugar Land TX MSA	114	90.48	4.07	1.75	21.17	13.16	30.33	28.95	44.43	56.14	1.24	0.00	1.07	1.27	1.32	
2014 San Antonio-New Braunfels TX MSA	2	1.59	4.79	0.00	24.08	0.00	34.59	100.00	36.54	0.00	0.05	0.00	0.00	0.16	0.00	
<b>Limited Review:</b>																
2014 Amarillo TX MSA	0	0.00	7.55	0.00	15.74	0.00	39.34	0.00	37.38	0.00	0.00	0.00	0.00	0.00	0.00	
2014 Austin-Round Rock TX MSA	2	1.59	4.38	0.00	17.54	0.00	38.78	0.00	39.30	100.00	0.07	0.00	0.00	0.00	0.15	
2014 Beaumont-Port Arthur TX MSA	0	0.00	4.03	0.00	27.85	0.00	33.03	0.00	35.10	0.00	0.00	0.00	0.00	0.00	0.00	
2014 Brownsville-Harlingen TX MSA	1	0.79	0.98	0.00	23.63	0.00	47.56	100.00	27.84	0.00	0.40	0.00	0.00	0.88	0.00	
2014 Cooke County TX	0	0.00	0.00	0.00	5.20	0.00	43.87	0.00	50.93	0.00	0.00	0.00	0.00	0.00	0.00	
2014 Dallas-Plano-Irving TX MD	3	2.38	5.45	66.67	19.40	0.00	27.57	33.33	47.58	0.00	0.04	1.90	0.00	0.00	0.00	
2014 East Texas Non-MSA TX	0	0.00	0.00	0.00	8.68	0.00	75.91	0.00	15.42	0.00	0.00	0.00	0.00	0.00	0.00	
2014 Fort Worth-Arlington TX MD	2	1.59	3.86	0.00	20.38	0.00	39.32	0.00	36.44	100.00	0.05	0.00	0.00	0.00	0.09	
2014 Gillespie County TX	0	0.00	0.00	0.00	0.00	0.00	32.07	0.00	67.93	0.00	0.00	0.00	0.00	0.00	0.00	
2014 Harrison County TX	0	0.00	0.00	0.00	12.39	0.00	33.21	0.00	54.40	0.00	0.00	0.00	0.00	0.00	0.00	
2014 Howard County TX	1	0.79	0.00	0.00	22.14	100.00	51.26	0.00	26.61	0.00	3.03	0.00	9.09	0.00	0.00	

\* Based on 2014 Peer Mortgage Data – US and PR

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

\*\*\* Percentage of Owner Occupied Units is the number of owner occupied units in a particular geography divided by the number of owner occupied housing units in the area based on 2010 Census information.

\*\*\*\* Data shown includes only One to Four-family and manufactured housing. (Property type of 1 or 2)

**Table 3. Geographic Distribution of Home Improvement Loans**

Geographic Distribution: HOME IMPROVEMENT			Geography: TEXAS				Evaluation Period: JANUARY 1, 2014 TO JUNE 30, 2015					Market Share (%) by Geography <sup>†</sup>				
Assessment Area:	Total Home Improvement Loans		Low-Income Geographies		Moderate-Income Geographies		Middle-Income Geographies		Upper-Income Geographies		Overall	Low	Mod	Mid	Upp	
	#	% of Total <sup>**</sup>	% Owner Occ Units <sup>***</sup>	% BANK Loans <sup>****</sup>	% Owner Occ Units <sup>***</sup>	% BANK Loans	% Owner Occ Units <sup>***</sup>	% BANK Loans	% Owner Occ Units <sup>***</sup>	% BANK Loans						
<b>Limited Review:</b>																
2014 Longview TX MSA	0	0.00	1.17	0.00	15.82	0.00	60.71	0.00	22.30	0.00	0.00	0.00	0.00	0.00	0.00	
2014 Northeast Non-MSA TX	0	0.00	0.00	0.00	18.63	0.00	78.05	0.00	3.32	0.00	0.00	0.00	0.00	0.00	0.00	
2014 Shelby County TX	0	0.00	0.00	0.00	17.01	0.00	82.99	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	
2014 Sherman-Denison TX MSA	0	0.00	0.00	0.00	23.02	0.00	57.35	0.00	19.64	0.00	0.00	0.00	0.00	0.00	0.00	
2014 Southeast Non-MSA TX	0	0.00	0.00	0.00	3.57	0.00	53.19	0.00	43.24	0.00	0.00	0.00	0.00	0.00	0.00	
2014 Southern Non-MSA TX	0	0.00	0.00	0.00	13.46	0.00	57.08	0.00	29.46	0.00	0.00	0.00	0.00	0.00	0.00	
2014 Texarkana TX MSA	1	0.79	1.13	0.00	5.11	100.00	63.33	0.00	30.43	0.00	0.93	0.00	20.00	0.00	0.00	
2014 Tyler TX MSA	0	0.00	1.20	0.00	21.75	0.00	42.20	0.00	34.85	0.00	0.00	0.00	0.00	0.00	0.00	

\* Based on 2014 Peer Mortgage Data – US and PR

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

\*\*\* Percentage of Owner Occupied Units is the number of owner occupied units in a particular geography divided by the number of owner occupied housing units in the area based on 2010 Census information.

\*\*\*\* Data shown includes only One to Four-family and manufactured housing. (Property type of 1 or 2)

**Table 4. Geographic Distribution of Home Mortgage Refinance Loans**

Geographic Distribution: HOME MORTGAGE REFINANCE			Geography: TEXAS				Evaluation Period: JANUARY 1, 2014 TO JUNE 30, 2015					Market Share (%) by Geography*				
Assessment Area:	Total Home Mortgage Refinance Loans		Low-Income Geographies		Moderate-Income Geographies		Middle-Income Geographies		Upper-Income Geographies							
	#	% of Total**	% Owner Occ Units***	% BANK Loans****	% Owner Occ Units***	% BANK Loans	% Owner Occ Units***	% BANK Loans	% Owner Occ Units***	% BANK Loans	Overall	Low	Mod	Mid	Upp	
<b>Full Review:</b>																
2014 Houston-The Woodlands-Sugar Land TX MSA	183	35.12	4.07	3.83	21.17	26.23	30.33	36.07	44.43	33.88	0.44	1.23	1.01	0.54	0.25	
2014 San Antonio-New Braunfels TX MSA	25	4.80	4.79	8.00	24.08	32.00	34.59	44.00	36.54	16.00	0.17	0.78	0.44	0.21	0.05	
<b>Limited Review:</b>																
2014 Amarillo TX MSA	28	5.37	7.55	0.00	15.74	10.71	39.34	42.86	37.38	46.43	0.76	0.00	0.56	0.85	0.77	
2014 Austin-Round Rock TX MSA	29	5.57	4.38	13.79	17.54	27.59	38.78	44.83	39.30	13.79	0.17	0.56	0.32	0.19	0.05	
2014 Beaumont-Port Arthur TX MSA	24	4.61	4.03	0.00	27.85	4.17	33.03	41.67	35.10	54.17	1.07	0.00	1.05	1.39	0.86	
2014 Brownsville-Harlingen TX MSA	22	4.22	0.98	0.00	23.63	27.27	47.56	27.27	27.84	45.45	1.44	0.00	4.38	0.79	1.45	
2014 Cooke County TX	2	0.38	0.00	0.00	5.20	0.00	43.87	50.00	50.93	50.00	0.94	0.00	0.00	1.28	0.75	
2014 Dallas-Plano-Irving TX MD	45	8.64	5.45	13.33	19.40	33.33	27.57	28.89	47.58	24.44	0.14	0.82	0.41	0.15	0.06	
2014 East Texas Non-MSA TX	28	5.37	0.00	0.00	8.68	7.14	75.91	89.29	15.42	3.57	1.58	0.00	2.13	1.88	0.00	
2014 Fort Worth-Arlington TX MD	33	6.33	3.86	3.03	20.38	30.30	39.32	54.55	36.44	12.12	0.22	0.84	0.56	0.31	0.05	
2014 Gillespie County TX	1	0.19	0.00	0.00	0.00	0.00	32.07	100.00	67.93	0.00	0.77	0.00	0.00	2.63	0.00	
2014 Harrison County TX	2	0.38	0.00	0.00	12.39	0.00	33.21	0.00	54.40	100.00	0.34	0.00	0.00	0.00	0.52	
2014 Howard County TX	0	0.00	0.00	0.00	22.14	0.00	51.26	0.00	26.61	0.00	0.00	0.00	0.00	0.00	0.00	

\* Based on 2014 Peer Mortgage Data – US and PR

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

\*\*\* Percentage of Owner Occupied Units is the number of owner occupied units in a particular geography divided by the number of owner occupied housing units in the area based on 2010 Census information.

\*\*\*\* Data shown includes only One to Four-family and manufactured housing. (Property type of 1 or 2)

**Table 4. Geographic Distribution of Home Mortgage Refinance Loans**

Geographic Distribution: HOME MORTGAGE REFINANCE			Geography: TEXAS				Evaluation Period: JANUARY 1, 2014 TO JUNE 30, 2015					Market Share (%) by Geography*				
Assessment Area:	Total Home Mortgage Refinance Loans		Low-Income Geographies		Moderate-Income Geographies		Middle-Income Geographies		Upper-Income Geographies		Overall	Low	Mod	Mid	Upp	
	#	% of Total**	% Owner Occ Units***	% BANK Loans****	% Owner Occ Units***	% BANK Loans	% Owner Occ Units***	% BANK Loans	% Owner Occ Units***	% BANK Loans						
<b>Limited Review:</b>																
2014 Longview TX MSA	22	4.22	1.17	0.00	15.82	18.18	60.71	63.64	22.30	18.18	1.16	0.00	0.85	1.67	0.38	
2014 Northeast Non-MSA TX	4	0.77	0.00	0.00	18.63	50.00	78.05	25.00	3.32	25.00	1.11	0.00	2.99	0.37	5.00	
2014 Shelby County TX	1	0.19	0.00	0.00	17.01	100.00	82.99	0.00	0.00	0.00	2.86	0.00	10.00	0.00	0.00	
2014 Sherman-Denison TX MSA	20	3.84	0.00	0.00	23.02	15.00	57.35	60.00	19.64	25.00	1.36	0.00	0.97	1.44	1.40	
2014 Southeast Non-MSA TX	21	4.03	0.00	0.00	3.57	4.76	53.19	76.19	43.24	19.05	1.25	0.00	6.25	1.82	0.37	
2014 Southern Non-MSA TX	2	0.38	0.00	0.00	13.46	50.00	57.08	0.00	29.46	50.00	1.43	0.00	7.14	0.00	2.50	
2014 Texarkana TX MSA	4	0.77	1.13	0.00	5.11	0.00	63.33	25.00	30.43	75.00	0.65	0.00	0.00	0.28	1.30	
2014 Tyler TX MSA	25	4.80	1.20	0.00	21.75	12.00	42.20	28.00	34.85	60.00	1.38	0.00	1.36	0.75	2.00	

\* Based on 2014 Peer Mortgage Data – US and PR

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

\*\*\* Percentage of Owner Occupied Units is the number of owner occupied units in a particular geography divided by the number of owner occupied housing units in the area based on 2010 Census information.

\*\*\*\* Data shown includes only One to Four-family and manufactured housing. (Property type of 1 or 2)

**Table 6. Geographic Distribution of Small Loans to Businesses**

Geographic Distribution: SMALL LOANS TO BUSINESSES			Geography: TEXAS				Evaluation Period: JANUARY 1, 2014 TO JUNE 30, 2015					Market Share (%) by Geography*				
Assessment Area:	Total Small Business Loans		Low-Income Geographies		Moderate-Income Geographies		Middle-Income Geographies		Upper-Income Geographies		Overall	Low	Mod	Mid	Upp	
	#	% of Total**	% of Businesses***	% BANK Loans	% of Businesses***	% BANK Loans	% of Businesses***	% BANK Loans	% of Businesses***	% BANK Loans						
<b>Full Review:</b>																
2014 Houston-The Woodlands-Sugar Land TX MSA	1,020	64.31	8.09	6.37	19.82	20.69	25.08	31.67	46.93	41.27	0.63	0.51	0.70	0.81	0.56	
2014 San Antonio-New Braunfels TX MSA	151	9.52	5.18	7.28	22.03	24.50	32.09	46.36	40.44	21.85	0.45	0.59	0.58	0.70	0.21	
<b>Limited Review:</b>																
2014 Amarillo TX MSA	4	0.25	20.06	50.00	11.71	25.00	34.52	0.00	33.51	25.00	0.00	0.00	0.00	0.00	0.00	
2014 Austin-Round Rock TX MSA	93	5.86	6.19	15.05	17.22	27.96	30.86	43.01	45.66	13.98	0.18	0.50	0.33	0.25	0.04	
2014 Beaumont-Port Arthur TX MSA	6	0.38	3.39	0.00	31.17	33.33	29.68	0.00	35.52	66.67	0.10	0.00	0.17	0.00	0.13	
2014 Brownsville-Harlingen TX MSA	11	0.69	3.90	0.00	28.28	18.18	36.86	81.82	30.65	0.00	0.08	0.00	0.10	0.13	0.00	
2014 Cooke County TX	0	0.00	0.00	0.00	11.53	0.00	44.69	0.00	43.77	0.00	0.00	0.00	0.00	0.00	0.00	
2014 Dallas-Plano-Irving TX MD	164	10.34	8.28	14.63	17.86	21.95	24.79	27.44	48.84	35.98	0.14	0.28	0.17	0.16	0.11	
2014 East Texas Non-MSA TX	26	1.64	0.00	0.00	8.85	11.54	79.76	88.46	11.40	0.00	0.93	0.00	1.69	1.08	0.00	
2014 Fort Worth-Arlington TX MD	42	2.65	4.84	2.38	21.04	33.33	35.05	23.81	38.93	40.48	0.08	0.06	0.15	0.05	0.09	
2014 Gillespie County TX	2	0.13	0.00	0.00	0.00	0.00	32.33	0.00	67.67	100.00	0.16	0.00	0.00	0.00	0.24	
2014 Harrison County TX	6	0.38	0.00	0.00	23.21	33.33	28.86	33.33	47.93	33.33	0.37	0.00	0.50	0.73	0.18	
2014 Howard County TX	2	0.13	0.00	0.00	34.56	0.00	40.10	50.00	25.34	50.00	0.24	0.00	0.00	0.75	0.00	

\* Based on 2014 Peer Small Business Data – US and PR

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

\*\*\* Source Data - Dun and Bradstreet (2014).

**Table 6. Geographic Distribution of Small Loans to Businesses**

Geographic Distribution: SMALL LOANS TO BUSINESSES			Geography: TEXAS						Evaluation Period: JANUARY 1, 2014 TO JUNE 30, 2015						
Assessment Area:	Total Small Business Loans		Low-Income Geographies		Moderate-Income Geographies		Middle-Income Geographies		Upper-Income Geographies		Market Share (%) by Geography*				
	#	% of Total**	% of Businesses***	% BANK Loans	% of Businesses***	% BANK Loans	% of Businesses***	% BANK Loans	% of Businesses***	% BANK Loans	Overall	Low	Mod	Mid	Upp
<b>Limited Review:</b>															
2014 Longview TX MSA	12	0.76	0.58	0.00	27.19	8.33	50.18	58.33	21.91	33.33	0.22	0.00	0.11	0.28	0.28
2014 Northeast Non-MSA TX	11	0.69	0.00	0.00	30.42	9.09	67.39	81.82	2.19	9.09	1.11	0.00	0.00	1.69	4.55
2014 Shelby County TX	3	0.19	0.00	0.00	44.26	33.33	55.74	66.67	0.00	0.00	0.62	0.00	0.98	0.51	0.00
2014 Sherman-Denison TX MSA	5	0.32	0.00	0.00	25.11	40.00	59.16	60.00	15.73	0.00	0.20	0.00	0.45	0.18	0.00
2014 Southeast Non-MSA TX	11	0.69	0.00	0.00	3.88	9.09	51.43	54.55	44.69	36.36	0.33	0.00	0.95	0.36	0.29
2014 Southern Non-MSA TX	7	0.44	0.00	0.00	15.76	0.00	57.95	71.43	26.29	28.57	0.36	0.00	0.00	0.65	0.00
2014 Texarkana TX MSA	4	0.25	6.93	0.00	6.62	0.00	51.09	75.00	35.36	25.00	0.31	0.00	0.00	0.54	0.19
2014 Tyler TX MSA	6	0.38	8.37	16.67	20.10	50.00	34.90	33.33	36.47	0.00	0.09	0.29	0.36	0.00	0.00

\* Based on 2014 Peer Small Business Data – US and PR

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

\*\*\* Source Data - Dun and Bradstreet (2014).

**Table 8. Borrower Distribution of Home Purchase Loans**

Borrower Distribution: HOME PURCHASE			Geography: TEXAS				Evaluation Period: JANUARY 1, 2014 TO JUNE 30, 2015					Market Share*				
Assessment Area:	Total Home Purchase Loans		Low-Income Borrowers		Moderate-Income Borrowers		Middle-Income Borrowers		Upper-Income Borrowers		Overall	Low	Mod	Mid	Upp	
	#	% of Total**	% Families***	% BANK Loans****	% Families <sup>13</sup>	% BANK Loans****	% Families***	% BANK Loans****	% Families***	% BANK Loans****						
<b>Full Review:</b>																
2014 Houston-The Woodlands-Sugar Land TX MSA	328	97.91	23.75	4.79	16.55	24.92	17.56	11.18	42.14	59.11	0.29	0.66	0.52	0.15	0.26	
2014 San Antonio-New Braunfels TX MSA	1	0.30	23.09	0.00	17.15	0.00	19.23	0.00	40.53	100.00	0.00	0.00	0.00	0.01	0.00	
<b>Limited Review:</b>																
2014 Amarillo TX MSA	0	0.00	22.75	0.00	16.80	0.00	20.04	0.00	40.41	0.00	0.00	0.00	0.00	0.00	0.00	
2014 Austin-Round Rock TX MSA	1	0.30	21.28	0.00	17.40	0.00	19.92	0.00	41.40	100.00	0.00	0.00	0.00	0.00	0.00	
2014 Beaumont-Port Arthur TX MSA	1	0.30	25.56	100.00	16.94	0.00	17.22	0.00	40.27	0.00	0.05	1.96	0.00	0.00	0.00	
2014 Brownsville-Harlingen TX MSA	0	0.00	24.34	0.00	15.96	0.00	17.55	0.00	42.14	0.00	0.00	0.00	0.00	0.00	0.00	
2014 Cooke County TX	0	0.00	16.62	0.00	15.41	0.00	17.71	0.00	50.27	0.00	0.00	0.00	0.00	0.00	0.00	
2014 Dallas-Plano-Irving TX MD	3	0.90	23.34	0.00	16.53	33.33	17.86	0.00	42.27	66.67	0.00	0.00	0.01	0.00	0.01	
2014 East Texas Non-MSA TX	0	0.00	19.00	0.00	17.71	0.00	21.03	0.00	42.27	0.00	0.00	0.00	0.00	0.00	0.00	
2014 Fort Worth-Arlington TX MD	0	0.00	21.74	0.00	17.49	0.00	19.49	0.00	41.27	0.00	0.00	0.00	0.00	0.00	0.00	
2014 Gillespie County TX	0	0.00	12.02	0.00	13.44	0.00	20.02	0.00	54.53	0.00	0.00	0.00	0.00	0.00	0.00	
2014 Harrison County TX	0	0.00	19.00	0.00	14.91	0.00	18.09	0.00	48.00	0.00	0.00	0.00	0.00	0.00	0.00	
2014 Howard County TX	0	0.00	21.09	0.00	16.73	0.00	16.40	0.00	45.77	0.00	0.00	0.00	0.00	0.00	0.00	

\* Based on 2014 Peer Mortgage Data – US and PR

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

\*\*\* Percentage of Families is based on the 2010 Census information.

\*\*\*\* As a percentage of loans with borrower income information available. No information was available for 4.5% of loans originated and purchased by bank.

13 Data shown includes only One to Four-family and manufactured housing. (Property type of 1 or 2)

**Table 8. Borrower Distribution of Home Purchase Loans**

Borrower Distribution: HOME PURCHASE		Geography: TEXAS					Evaluation Period: JANUARY 1, 2014 TO JUNE 30, 2015					Market Share*				
Assessment Area:	Total Home Purchase Loans		Low-Income Borrowers		Moderate-Income Borrowers		Middle-Income Borrowers		Upper-Income Borrowers		Overall	Low	Mod	Mid	Upp	
	#	% of Total**	% Families***	% BANK Loans****	% Families <sup>14</sup>	% BANK Loans****	% Families***	% BANK Loans****	% Families***	% BANK Loans****						
<b>Limited Review:</b>																
2014 Longview TX MSA	0	0.00	21.51	0.00	17.88	0.00	19.98	0.00	40.62	0.00	0.00	0.00	0.00	0.00	0.00	
2014 Northeast Non-MSA TX	0	0.00	22.95	0.00	19.46	0.00	20.28	0.00	37.32	0.00	0.00	0.00	0.00	0.00	0.00	
2014 Shelby County TX	0	0.00	28.29	0.00	20.00	0.00	15.92	0.00	35.78	0.00	0.00	0.00	0.00	0.00	0.00	
2014 Sherman-Denison TX MSA	0	0.00	20.83	0.00	18.13	0.00	21.26	0.00	39.78	0.00	0.00	0.00	0.00	0.00	0.00	
2014 Southeast Non-MSA TX	0	0.00	19.48	0.00	16.37	0.00	18.29	0.00	45.85	0.00	0.00	0.00	0.00	0.00	0.00	
2014 Southern Non-MSA TX	1	0.30	22.82	0.00	15.63	0.00	19.54	0.00	42.01	100.00	0.23	0.00	0.00	0.00	0.36	
2014 Texarkana TX MSA	0	0.00	21.82	0.00	15.72	0.00	18.98	0.00	43.48	0.00	0.00	0.00	0.00	0.00	0.00	
2014 Tyler TX MSA	0	0.00	21.56	0.00	17.22	0.00	19.54	0.00	41.68	0.00	0.00	0.00	0.00	0.00	0.00	

\* Based on 2014 Peer Mortgage Data – US and PR

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

\*\*\* Percentage of Families is based on the 2010 Census information.

\*\*\*\* As a percentage of loans with borrower income information available. No information was available for 4.5% of loans originated and purchased by bank.

14 Data shown includes only One to Four-family and manufactured housing. (Property type of 1 or 2)



**Table 9. Borrower Distribution of Home Improvement Loans**

Borrower Distribution: HOME IMPROVEMENT		Geography: TEXAS					Evaluation Period: JANUARY 1, 2014 TO JUNE 30, 2015					Market Share*				
Assessment Area:	Total Home Improvement Loans		Low-Income Borrowers		Moderate-Income Borrowers		Middle-Income Borrowers		Upper-Income Borrowers		Overall	Low	Mod	Mid	Upp	
	#	% of Total**	% Families***	% BANK Loans****	% Families <sup>15</sup>	% BANK Loans****	% Families***	% BANK Loans****	% Families***	% BANK Loans****						
<b>Full Review:</b>																
2014 Houston-The Woodlands-Sugar Land TX MSA	114	90.48	23.75	10.00	16.55	16.36	17.56	14.55	42.14	59.09	1.25	1.35	1.95	1.86	1.00	
2014 San Antonio-New Braunfels TX MSA	2	1.59	23.09	0.00	17.15	50.00	19.23	50.00	40.53	0.00	0.05	0.00	0.40	0.00	0.00	
<b>Limited Review:</b>																
2014 Amarillo TX MSA	0	0.00	22.75	0.00	16.80	0.00	20.04	0.00	40.41	0.00	0.00	0.00	0.00	0.00	0.00	
2014 Austin-Round Rock TX MSA	2	1.59	21.28	0.00	17.40	100.00	19.92	0.00	41.40	0.00	0.08	0.00	0.56	0.00	0.00	
2014 Beaumont-Port Arthur TX MSA	0	0.00	25.56	0.00	16.94	0.00	17.22	0.00	40.27	0.00	0.00	0.00	0.00	0.00	0.00	
2014 Brownsville-Harlingen TX MSA	1	0.79	24.34	0.00	15.96	0.00	17.55	0.00	42.14	100.00	0.42	0.00	0.00	0.00	0.63	
2014 Cooke County TX	0	0.00	16.62	0.00	15.41	0.00	17.71	0.00	50.27	0.00	0.00	0.00	0.00	0.00	0.00	
2014 Dallas-Plano-Irving TX MD	3	2.38	23.34	0.00	16.53	33.33	17.86	66.67	42.27	0.00	0.05	0.00	0.25	0.18	0.00	
2014 East Texas Non-MSA TX	0	0.00	19.00	0.00	17.71	0.00	21.03	0.00	42.27	0.00	0.00	0.00	0.00	0.00	0.00	
2014 Fort Worth-Arlington TX MD	2	1.59	21.74	0.00	17.49	0.00	19.49	0.00	41.27	100.00	0.05	0.00	0.00	0.00	0.09	
2014 Gillespie County TX	0	0.00	12.02	0.00	13.44	0.00	20.02	0.00	54.53	0.00	0.00	0.00	0.00	0.00	0.00	
2014 Harrison County TX	0	0.00	19.00	0.00	14.91	0.00	18.09	0.00	48.00	0.00	0.00	0.00	0.00	0.00	0.00	
2014 Howard County TX	1	0.79	21.09	0.00	16.73	100.00	16.40	0.00	45.77	0.00	3.45	0.00	14.29	0.00	0.00	

\* Based on 2014 Peer Mortgage Data – US and PR

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

\*\*\* Percentage of Families is based on the 2010 Census information.

\*\*\*\* As a percentage of loans with borrower income information available. No information was available for 4.0% of loans originated and purchased by bank.

15 Data shown includes only One to Four-family and manufactured housing. (Property type of 1 or 2)

**Table 9. Borrower Distribution of Home Improvement Loans**

Borrower Distribution: HOME IMPROVEMENT			Geography: TEXAS				Evaluation Period: JANUARY 1, 2014 TO JUNE 30, 2015					Market Share*				
Assessment Area:	Total Home Improvement Loans		Low-Income Borrowers		Moderate-Income Borrowers		Middle-Income Borrowers		Upper-Income Borrowers		Market Share*					
	#	% of Total**	% Families***	% BANK Loans****	% Families <sup>16</sup>	% BANK Loans****	% Families***	% BANK Loans****	% Families***	% BANK Loans****	Overall	Low	Mod	Mid	Upp	
<b>Limited Review:</b>																
2014 Longview TX MSA	0	0.00	21.51	0.00	17.88	0.00	19.98	0.00	40.62	0.00	0.00	0.00	0.00	0.00	0.00	
2014 Northeast Non-MSA TX	0	0.00	22.95	0.00	19.46	0.00	20.28	0.00	37.32	0.00	0.00	0.00	0.00	0.00	0.00	
2014 Shelby County TX	0	0.00	28.29	0.00	20.00	0.00	15.92	0.00	35.78	0.00	0.00	0.00	0.00	0.00	0.00	
2014 Sherman-Denison TX MSA	0	0.00	20.83	0.00	18.13	0.00	21.26	0.00	39.78	0.00	0.00	0.00	0.00	0.00	0.00	
2014 Southeast Non-MSA TX	0	0.00	19.48	0.00	16.37	0.00	18.29	0.00	45.85	0.00	0.00	0.00	0.00	0.00	0.00	
2014 Southern Non-MSA TX	0	0.00	22.82	0.00	15.63	0.00	19.54	0.00	42.01	0.00	0.00	0.00	0.00	0.00	0.00	
2014 Texarkana TX MSA	1	0.79	21.82	100.00	15.72	0.00	18.98	0.00	43.48	0.00	1.00	11.11	0.00	0.00	0.00	
2014 Tyler TX MSA	0	0.00	21.56	0.00	17.22	0.00	19.54	0.00	41.68	0.00	0.00	0.00	0.00	0.00	0.00	

\* Based on 2014 Peer Mortgage Data – US and PR

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

\*\*\* Percentage of Families is based on the 2010 Census information.

\*\*\*\* As a percentage of loans with borrower income information available. No information was available for 4.0% of loans originated and purchased by bank.

16 Data shown includes only One to Four-family and manufactured housing. (Property type of 1 or 2)

**Table 10. Borrower Distribution of Home Mortgage Refinance Loans**

Borrower Distribution: HOME MORTGAGE REFINANCE			Geography: TEXAS				Evaluation Period: JANUARY 1, 2014 TO JUNE 30, 2015					Market Share <sup>†</sup>				
Assessment Area:	Total Home Mortgage Refinance Loans		Low-Income Borrowers		Moderate-Income Borrowers		Middle-Income Borrowers		Upper-Income Borrowers		Overall	Low	Mod	Mid	Upp	
	#	% of Total**	% Families***	% BANK Loans****	% Families <sup>17</sup>	% BANK Loans****	% Families***	% BANK Loans****	% Families***	% BANK Loans****						
<b>Full Review:</b>																
2014 Houston-The Woodlands-Sugar Land TX MSA	183	35.12	23.75	15.08	16.55	21.79	17.56	19.55	42.14	43.58	0.53	2.00	0.66	0.53	0.36	
2014 San Antonio-New Braunfels TX MSA	25	4.80	23.09	20.00	17.15	32.00	19.23	20.00	40.53	28.00	0.24	0.85	0.62	0.22	0.11	
<b>Limited Review:</b>																
2014 Amarillo TX MSA	28	5.37	22.75	3.57	16.80	32.14	20.04	25.00	40.41	39.29	1.00	0.00	2.58	0.88	0.63	
2014 Austin-Round Rock TX MSA	29	5.57	21.28	20.69	17.40	27.59	19.92	31.03	41.40	20.69	0.21	1.00	0.40	0.29	0.04	
2014 Beaumont-Port Arthur TX MSA	24	4.61	25.56	0.00	16.94	8.33	17.22	37.50	40.27	54.17	1.31	0.00	0.00	2.91	1.05	
2014 Brownsville-Harlingen TX MSA	22	4.22	24.34	0.00	15.96	13.64	17.55	9.09	42.14	77.27	1.81	0.00	4.35	1.35	1.71	
2014 Cooke County TX	2	0.38	16.62	50.00	15.41	0.00	17.71	0.00	50.27	50.00	1.22	50.00	0.00	0.00	0.80	
2014 Dallas-Plano-Irving TX MD	45	8.64	23.34	31.11	16.53	31.11	17.86	24.44	42.27	13.33	0.18	0.92	0.47	0.19	0.04	
2014 East Texas Non-MSA TX	28	5.37	19.00	10.71	17.71	3.57	21.03	21.43	42.27	64.29	1.97	7.69	0.00	0.85	2.33	
2014 Fort Worth-Arlington TX MD	33	6.33	21.74	36.36	17.49	39.39	19.49	9.09	41.27	15.15	0.30	2.12	0.65	0.08	0.07	
2014 Gillespie County TX	1	0.19	12.02	0.00	13.44	0.00	20.02	100.00	54.53	0.00	0.84	0.00	0.00	3.70	0.00	
2014 Harrison County TX	2	0.38	19.00	0.00	14.91	0.00	18.09	50.00	48.00	50.00	0.43	0.00	0.00	0.00	0.57	
2014 Howard County TX	0	0.00	21.09	0.00	16.73	0.00	16.40	0.00	45.77	0.00	0.00	0.00	0.00	0.00	0.00	

\* Based on 2014 Peer Mortgage Data – US and PR

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

\*\*\* Percentage of Families is based on the 2010 Census information.

\*\*\*\* As a percentage of loans with borrower income information available. No information was available for 0.8% of loans originated and purchased by bank.

17 Data shown includes only One to Four-family and manufactured housing. (Property type of 1 or 2)

**Table 10. Borrower Distribution of Home Mortgage Refinance Loans**

Borrower Distribution: HOME MORTGAGE REFINANCE			Geography: TEXAS						Evaluation Period: JANUARY 1, 2014 TO JUNE 30, 2015						
Assessment Area:	Total Home Mortgage Refinance Loans		Low-Income Borrowers		Moderate-Income Borrowers		Middle-Income Borrowers		Upper-Income Borrowers		Market Share <sup>†</sup>				
	#	% of Total <sup>**</sup>	% Families <sup>***</sup>	% BANK Loans <sup>****</sup>	% Families <sup>18</sup>	% BANK Loans <sup>****</sup>	% Families <sup>***</sup>	% BANK Loans <sup>****</sup>	% Families <sup>***</sup>	% BANK Loans <sup>****</sup>	Overall	Low	Mod	Mid	Upp
<b>Limited Review:</b>															
2014 Longview TX MSA	22	4.22	21.51	0.00	17.88	27.27	19.98	36.36	40.62	36.36	1.43	0.00	3.37	1.83	0.99
2014 Northeast Non-MSA TX	4	0.77	22.95	0.00	19.46	25.00	20.28	25.00	37.32	50.00	1.27	0.00	2.63	1.37	1.08
2014 Shelby County TX	1	0.19	28.29	0.00	20.00	0.00	15.92	0.00	35.78	100.00	3.85	0.00	0.00	0.00	5.56
2014 Sherman-Denison TX MSA	20	3.84	20.83	0.00	18.13	30.00	21.26	15.00	39.78	55.00	1.74	0.00	2.00	2.27	1.59
2014 Southeast Non-MSA TX	21	4.03	19.48	0.00	16.37	19.05	18.29	9.52	45.85	71.43	1.45	0.00	2.27	0.00	1.59
2014 Southern Non-MSA TX	2	0.38	22.82	0.00	15.63	0.00	19.54	50.00	42.01	50.00	1.75	0.00	7.14	0.00	1.28
2014 Texarkana TX MSA	4	0.77	21.82	0.00	15.72	25.00	18.98	0.00	43.48	75.00	0.81	0.00	1.59	0.96	0.66
2014 Tyler TX MSA	25	4.80	21.56	8.00	17.22	20.00	19.54	32.00	41.68	40.00	1.70	3.64	1.63	2.48	1.29

\* Based on 2014 Peer Mortgage Data – US and PR

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

\*\*\* Percentage of Families is based on the 2010 Census information.

\*\*\*\* As a percentage of loans with borrower income information available. No information was available for 0.8% of loans originated and purchased by bank.

18 Data shown includes only One to Four-family and manufactured housing. (Property type of 1 or 2)

**Table 11. Borrower Distribution of Small Loans to Businesses**

Borrower Distribution: SMALL LOANS TO BUSINESSES					Geography: TEXAS			Evaluation Period: JANUARY 1, 2014 TO JUNE 30, 2015		
Assessment Area:	Total Small Loans to Businesses		Businesses With Revenues of \$1 million or less		Loans by Original Amount Regardless of Business Size			Market Share <sup>†</sup>		
	#	% of Total <sup>**</sup>	% of Businesses <sup>***</sup>	% BANK Loans <sup>****</sup>	\$100,000 or less	>\$100,000 to \$250,000	>\$250,000 to \$1,000,000	All	Rev\$ 1 Million or Less	
<b>Full Review:</b>										
2014 Houston-The Woodlands-Sugar Land TX MSA	1,020	64.31	71.57	81.86	84.80	8.14	7.06	0.63	1.16	
2014 San Antonio-New Braunfels TX MSA	151	9.52	70.82	93.38	95.36	4.64	0.00	0.45	0.97	
<b>Limited Review:</b>										
2014 Amarillo TX MSA	4	0.25	72.71	100.00	100.00	0.00	0.00	0.00	0.00	
2014 Austin-Round Rock TX MSA	93	5.86	70.12	93.55	98.92	1.08	0.00	0.18	0.36	
2014 Beaumont-Port Arthur TX MSA	6	0.38	69.81	83.33	100.00	0.00	0.00	0.10	0.24	
2014 Brownsville-Harlingen TX MSA	11	0.69	69.20	63.64	100.00	0.00	0.00	0.08	0.16	
2014 Cooke County TX	0	0.00	72.82	0.00	0.00	0.00	0.00	0.00	0.00	
2014 Dallas-Plano-Irving TX MD	164	10.34	70.60	88.41	96.95	3.05	0.00	0.14	0.28	
2014 East Texas Non-MSA TX	26	1.64	73.83	100.00	100.00	0.00	0.00	0.93	1.85	
2014 Fort Worth-Arlington TX MD	42	2.65	70.29	85.71	95.24	2.38	2.38	0.08	0.16	
2014 Gillespie County TX	2	0.13	75.99	100.00	100.00	0.00	0.00	0.16	0.45	
2014 Harrison County TX	6	0.38	72.07	100.00	100.00	0.00	0.00	0.37	0.81	
2014 Howard County TX	2	0.13	67.58	100.00	100.00	0.00	0.00	0.24	0.68	

\* Based on 2014 Peer Small Business Data – US and PR

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

\*\*\* Businesses with revenues of \$1 million or less as a percentage of all businesses (Source D&B - 2014).

\*\*\*\* Small loans to businesses with revenues of \$1 million or less as a percentage of all loans reported as small loans to businesses. No information was available for 2.52% of small loans to businesses originated and purchased by the bank.

**Table 11. Borrower Distribution of Small Loans to Businesses**

Borrower Distribution: SMALL LOANS TO BUSINESSES			Geography: TEXAS		Evaluation Period: JANUARY 1, 2014 TO JUNE 30, 2015				
Assessment Area:	Total Small Loans to Businesses		Businesses With Revenues of \$1 million or less		Loans by Original Amount Regardless of Business Size			Market Share*	
	#	% of Total**	% of Businesses***	% BANK Loans****	\$100,000 or less	>\$100,000 to \$250,000	>\$250,000 to \$1,000,000	All	Rev\$ 1 Million or Less
<b>Limited Review:</b>									
2014 Longview TX MSA	12	0.76	69.84	91.67	100.00	0.00	0.00	0.22	0.54
2014 Northeast Non-MSA TX	11	0.69	69.92	100.00	100.00	0.00	0.00	1.11	2.71
2014 Shelby County TX	3	0.19	72.48	100.00	100.00	0.00	0.00	0.62	1.64
2014 Sherman-Denison TX MSA	5	0.32	73.22	80.00	100.00	0.00	0.00	0.20	0.43
2014 Southeast Non-MSA TX	11	0.69	71.99	100.00	100.00	0.00	0.00	0.33	0.74
2014 Southern Non-MSA TX	7	0.44	65.23	100.00	100.00	0.00	0.00	0.36	0.95
2014 Texarkana TX MSA	4	0.25	71.16	100.00	100.00	0.00	0.00	0.31	0.66
2014 Tyler TX MSA	6	0.38	73.27	100.00	100.00	0.00	0.00	0.09	0.20

\* Based on 2014 Peer Small Business Data – US and PR

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

\*\*\* Businesses with revenues of \$1 million or less as a percentage of all businesses (Source D&B - 2014).

\*\*\*\* Small loans to businesses with revenues of \$1 million or less as a percentage of all loans reported as small loans to businesses. No information was available for 2.52% of small loans to businesses originated and purchased by the bank.

**Table 13. Geographic and Borrower Distribution of Consumer Loans**

Geographic and Borrower Distribution: CONSUMER LOANS																			Geography: TEXAS				Evaluation Period: JANUARY 1, 2014 TO JUNE 30, 2015			
Assessment Area:	Geographic Distribution										Borrower Distribution															
	Total Consumer Loans		Low-Income Geographies		Moderate-Income Geographies		Middle-Income Geographies		Upper-Income Geographies		Low-Income Borrowers		Moderate-Income Borrowers		Middle-Income Borrowers		Upper-Income Borrowers									
	#	% of Total*	% of Hhlds**	% of BANK Loans	% of Hhlds**	% of BANK Loans	% of Hhlds**	% of BANK Loans	% of Hhlds**	% of BANK Loans	% of Hhlds**	% of BANK Loans	% of Hhlds**	% of BANK Loans	% of Hhlds**	% of BANK Loans	% of Hhlds**	% of BANK Loans								
<b>Full Review:</b>																										
2014 Houston-The Woodlands-Sugar Land TX MSA	3,490	51.50	9.61	7.79	25.31	27.34	28.45	37.51	36.63	27.36	24.19	45.64	16.41	23.81	16.95	15.27	42.45	15.27								
2014 San Antonio-New Braunfels TX MSA	645	9.52	6.63	8.22	28.31	28.37	33.94	45.89	31.11	17.52	24.96	55.50	16.27	22.95	18.01	13.49	40.76	8.06								
<b>Limited Review:</b>																										
2014 Amarillo TX MSA	70	1.03	11.48	17.14	17.68	20.00	39.91	51.43	30.93	11.43	24.78	62.86	16.33	15.71	17.41	12.86	41.48	8.57								
2014 Austin-Round Rock TX MSA	399	5.89	10.25	12.03	22.29	29.57	36.03	42.11	31.43	16.29	23.00	58.65	16.84	25.31	18.07	10.78	42.09	5.26								
2014 Beaumont-Port Arthur TX MSA	48	0.71	6.56	8.33	31.69	41.67	30.41	20.83	31.33	29.17	26.65	50.00	16.35	20.83	16.26	16.67	40.74	12.50								
2014 Brownsville-Harlingen TX MSA	69	1.02	2.11	2.90	26.81	10.14	46.80	57.97	24.26	28.99	26.03	36.23	15.46	27.54	15.93	17.39	42.58	18.84								
2014 Cooke County TX	25	0.37	0.00	0.00	9.60	16.00	46.23	60.00	44.17	24.00	19.25	40.00	12.41	36.00	16.64	12.00	51.70	12.00								
2014 Dallas-Plano-Irving TX MD	649	9.58	11.77	10.02	23.58	28.51	27.43	34.05	37.23	27.43	23.52	56.86	16.94	22.80	17.50	13.25	42.03	7.09								
2014 East Texas Non-MSA TX	232	3.42	0.00	0.00	10.46	9.91	75.15	79.31	14.40	10.78	22.92	50.43	15.11	22.84	17.68	13.79	44.29	12.93								
2014 Fort Worth-Arlington TX MD	413	6.09	6.04	8.96	25.93	29.54	39.82	39.71	28.22	21.79	22.91	57.38	17.06	18.89	18.49	13.32	41.55	10.41								

\* Consumer Loans originated and purchased in the MA/AA as a percentage of all consumer loans originated and purchased in the rated area.  
 \*\* Percentage of households is based on 2010 Census Information.

**Table 13. Geographic and Borrower Distribution of Consumer Loans**

Geographic and Borrower Distribution: CONSUMER LOANS										Geography: TEXAS				Evaluation Period: JANUARY 1, 2014 TO JUNE 30, 2015					
Assessment Area:	Geographic Distribution										Borrower Distribution								
	Total Consumer Loans		Low-Income Geographies		Moderate-Income Geographies		Middle-Income Geographies		Upper-Income Geographies		Low-Income Borrowers		Moderate-Income Borrowers		Middle-Income Borrowers		Upper-Income Borrowers		
	#	% of Total*	% of Hhlds**	% of BANK Loans	% of Hhlds**	% of BANK Loans	% of Hhlds**	% of BANK Loans	% of Hhlds**	% of BANK Loans	% of Hhlds**	% of BANK Loans	% of Hhlds**	% of BANK Loans	% of Hhlds**	% of BANK Loans	% of Hhlds**	% of BANK Loans	
<b>Limited Review:</b>																			
2014 Gillespie County TX	24	0.35	0.00	0.00	0.00	0.00	32.01	25.00	67.99	75.00	17.22	37.50	12.01	16.67	16.61	20.83	54.15	25.00	
2014 Harrison County TX	94	1.39	0.00	0.00	14.72	34.04	33.20	29.79	52.09	36.17	21.71	47.87	13.63	22.34	17.14	17.02	47.51	12.77	
2014 Howard County TX	33	0.49	0.00	0.00	24.21	24.24	54.58	42.42	21.22	33.33	22.85	27.27	18.11	33.33	15.42	27.27	43.62	12.12	
2014 Longview TX MSA	83	1.22	1.59	0.00	19.76	19.28	57.11	73.49	21.54	7.23	23.67	51.81	15.94	27.71	18.36	9.64	42.03	10.84	
2014 Northeast Non-MSA TX	138	2.04	0.00	0.00	21.12	25.36	76.05	68.12	2.83	6.52	26.29	53.62	16.53	23.19	18.70	13.04	38.48	10.14	
2014 Shelby County TX	29	0.43	0.00	0.00	22.72	24.14	77.28	75.86	0.00	0.00	27.67	55.17	19.82	17.24	15.94	13.79	36.57	13.79	
2014 Sherman-Denison TX MSA	50	0.74	0.00	0.00	24.36	34.00	59.24	56.00	16.39	10.00	23.17	54.00	16.54	28.00	18.56	10.00	41.73	8.00	
2014 Southeast Non-MSA TX	91	1.34	0.00	0.00	5.21	7.69	54.15	53.85	40.65	38.46	22.64	39.56	15.77	31.87	15.73	14.29	45.86	14.29	
2014 Southern Non-MSA TX	89	1.31	0.00	0.00	19.59	32.58	52.89	37.08	27.51	30.34	24.43	49.44	15.09	23.60	17.27	13.48	43.21	13.48	
2014 Texarkana TX MSA	39	0.58	2.66	2.56	8.75	17.95	61.38	58.97	27.21	20.51	24.51	46.15	14.82	33.33	16.86	7.69	43.81	12.82	
2014 Tyler TX MSA	67	0.99	3.07	4.48	24.21	53.73	40.70	32.84	32.02	8.96	23.67	62.69	16.58	20.90	17.64	8.96	42.11	7.46	

\* Consumer Loans originated and purchased in the MA/AA as a percentage of all consumer loans originated and purchased in the rated area.  
 \*\* Percentage of households is based on 2010 Census Information.



Table 14. Qualified Investments

QUALIFIED INVESTMENTS									
Geography: TEXAS									
Evaluation Period: JUNE 24, 2012 TO JULY 13, 2015									
Assessment Area:	Prior Period Investments*		Current Period Investments		Total Investments			Unfunded Commitments**	
	#	\$(000's)	#	\$(000's)	#	\$(000's)	% of Total	#	\$(000's)
<b>Full Review:</b>									
2014 Houston-The Woodlands-Sugar Land TX MSA	3	1,708	157	53,504	160	55,212	69.60	0	0
2014 San Antonio-New Braunfels TX MSA	0	0	16	5,924	16	5,924	7.47	0	0
<b>Limited Review:</b>									
2014 Amarillo TX MSA	0	0	1	89	1	89	0.11	0	0
2014 Austin-Round Rock TX MSA	0	0	24	3,214	24	3,214	4.05	0	0
2014 Beaumont-Port Arthur TX MSA	0	0	3	214	3	214	0.27	0	0
2014 Brownsville-Harlingen TX MSA	0	0	8	401	8	401	0.51	0	0
2014 Cooke County TX	0	0	1	82	1	82	0.10	0	0
2014 Dallas-Plano-Irving TX MD	3	931	33	7,621	36	8,552	10.78	0	0
2014 East Texas Non-MSA TX	0	0	4	338	4	338	0.43	0	0
2014 Fort Worth-Arlington TX MD	1	373	15	1,283	16	1,656	2.09	0	0
2014 Gillespie County TX	0	0	1	1	1	1	0.00	0	0
2014 Harrison County TX	0	0	3	297	3	297	0.37	0	0
2014 Howard County TX	0	0	2	85	2	85	0.11	0	0
2014 Longview TX MSA	0	0	1	165	1	165	0.21	0	0
2014 Northeast Non-MSA TX	0	0	1	2,048	1	2,048	2.58	0	0
2014 Shelby County TX	0	0	1	98	1	98	0.12	0	0
2014 Sherman-Denison TX MSA	0	0	1	148	1	148	0.19	0	0
2014 Southeast Non-MSA TX	0	0	1	118	1	118	0.15	0	0
2014 Southern Non-MSA TX	0	0	3	90	3	90	0.11	0	0
2014 Texarkana TX MSA	0	0	1	116	1	116	0.15	0	0
2014 Tyler TX MSA	0	0	4	479	4	479	0.60	0	0

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

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

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

DISTRIBUTION OF BRANCH DELIVERY SYSTEM AND BRANCH OPENINGS/CLOSINGS																	Geography: TEXAS		Evaluation Period: JANUARY 1, 2014 TO JUNE 30, 2015			
MA/Assessment Area:	Deposits	Branches						Branch Openings/Closings						Population								
	% of Rated Area Deposits in AA	# of BANK Branches	% of Rated Area Branches in AA	Location of Branches by Income of Geographies (%)				# of Branch Openings	# of Branch Closings	Net change in Location of Branches (+ or -)				% of Population within Each Geography								
				Low	Mod	Mid	Upp			Low	Mod	Mid	Upp	Low	Mod	Mid	Upp					
<b>Full Review:</b>																						
2014 Houston-The Woodlands-Sugar Land TX MSA	91.20	105	51.72	5.71	20.00	27.62	46.67	1	3	0	-1	-1	+1/-1	9.38	26.07	28.96	35.25					
2014 San Antonio-New Braunfels TX MSA	1.12	19	9.36	0.00	21.06	57.89	21.05	1	0	0	0	+1	0	7.12	29.35	32.79	30.74					
<b>Limited Review:</b>																						
2014 Amarillo TX MSA	0.14	2	0.99	0.00	50.00	0.00	50.00	0	0	0	0	0	0	11.87	19.29	39.59	29.26					
2014 Austin-Round Rock TX MSA	0.95	11	5.42	9.10	18.18	45.45	27.27	0	0	0	0	0	0	10.99	22.97	34.81	31.10					
2014 Beaumont-Port Arthur TX MSA	0.18	2	0.99	0.00	0.00	67.67	33.33	0	0	0	0	0	0	7.48	30.81	28.00	30.42					
2014 Brownsville-Harlingen TX MSA	0.05	1	0.50	0.00	0.00	100.00	0.00	0	0	0	0	0	0	1.86	28.20	47.90	22.03					
2014 Cooke County TX	0.05	1	0.50	0.00	100.00	0.00	0.00	0	0	0	0	0	0	0.00	9.39	48.13	42.49					
2014 Dallas-Plano-Irving TX MD	2.15	24	11.82	4.17	20.83	20.83	54.17	0	1	0	0	-1	0	11.85	25.21	26.19	36.75					
2014 East Texas Non-MSA TX	0.99	5	2.46	0.00	40.00	60.00	0.00	0	0	0	0	0	0	0.00	10.78	75.90	13.33					
2014 Fort Worth-Arlington TX MD	1.45	15	7.39	0.00	33.33	20.00	46.67	0	0	0	0	0	0	6.90	25.94	37.37	29.79					
2014 Gillespie County TX	0.10	1	0.50	0.00	0.00	0.00	100.00	0	0	0	0	0	0	0.00	0.00	31.17	68.83					
2014 Harrison County TX	0.14	2	0.99	0.00	100.00	0.00	0.00	0	0	0	0	0	0	0.00	16.01	32.63	51.36					
2014 Howard County TX	0.11	1	0.50	0.00	0.00	100.00	0.00	0	0	0	0	0	0	0.00	25.12	58.24	16.63					

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

DISTRIBUTION OF BRANCH DELIVERY SYSTEM AND BRANCH OPENINGS/CLOSINGS																	Geography: TEXAS				Evaluation Period: JANUARY 1, 2014 TO JUNE 30, 2015			
MA/Assessment Area:	Deposits	Branches						Branch Openings/Closings						Population										
	% of Rated Area Deposits in AA	# of BANK Branches	% of Rated Area Branches in AA	Location of Branches by Income of Geographies (%)				# of Branch Openings	# of Branch Closings	Net change in Location of Branches (+ or -)				% of Population within Each Geography										
				Low	Mod	Mid	Upp			Low	Mod	Mid	Upp	Low	Mod	Mid	Upp							
<b>Limited Review:</b>																								
2014 Longview TX MSA	0.18	2	0.99	0.00	0.00	50.00	50.00	0	0	0	0	0	0	1.73	22.28	56.50	19.49							
2014 Northeast Non-MSA TX	0.15	1	0.50	0.00	0.00	100.00	0.00	0	0	0	0	0	0	0.00	22.09	75.05	2.86							
2014 Shelby County TX	0.09	1	0.50	0.00	100.00	0.00	0.00	0	0	0	0	0	0	0.00	23.59	76.41	0.00							
2014 Sherman-Denison TX MSA	0.10	2	0.99	0.00	0.00	100.00	0.00	0	0	0	0	0	0	0.00	25.43	56.28	18.29							
2014 Southeast Non-MSA TX	0.25	3	1.48	0.00	0.00	100.00	0.00	0	0	0	0	0	0	0.00	5.84	54.37	39.79							
2014 Southern Non-MSA TX	0.46	3	1.48	0.00	0.00	33.33	66.67	0	0	0	0	0	0	0.00	19.33	47.93	32.74							
2014 Texarkana TX MSA	0.05	1	0.50	0.00	0.00	0.00	100.00	0	0	0	0	0	0	3.12	7.36	62.01	27.51							
2014 Tyler TX MSA	0.09	1	0.50	0.00	100.00	0.00	0.00	0	0	0	0	0	0	3.33	26.76	39.09	30.82							

Alabama

Table 1. Lending Volume

LENDING VOLUME		Geography: ALABAMA				Evaluation Period: JANUARY 1, 2014 TO JUNE 30, 2015						
Assessment Area (2014):	% of Rated Area Loans (#) in MA/AA*	Home Mortgage		Small Loans to Businesses		Small Loans to Farms		Community Development Loans**		Total Reported Loans		% of Rated Area Deposits in MA/AA***
		#	\$ (000's)	#	\$ (000's)	#	\$ (000's)	#	\$ (000's)	#	\$(000's)	
<b>Full Review:</b>												
2014 Huntsville AL MSA	12.33	34	3,912	9	106	0	0	2	70	45	4,088	10.77
<b>Limited Review:</b>												
2014 Anniston-Oxford-Jacksonville AL MSA	3.56	10	815	1	2	0	0	2	20	13	837	4.83
2014 Birmingham-Hoover AL MSA	17.81	39	4,433	23	839	0	0	3	60	65	5,332	22.22
2014 Cullman and Marshall Counties AL	7.40	22	2,125	3	9	0	0	2	25	27	2,159	8.63
2014 Daphne-Fairhope-Foley AL MSA	9.03	22	2,675	9	12	0	0	2	40	33	2,727	8.89
2014 Decatur AL MSA	8.22	23	2,716	5	7	0	0	2	20	30	2,743	4.58
2014 Mobile AL MSA	10.68	25	2,275	12	16	0	0	2	40	39	2,331	10.75
2014 Montgomery AL MSA	9.03	28	3,125	3	5	0	0	2	40	33	3,170	11.93
2014 Southern Non-MSA AL	12.08	25	2,394	17	180	0	0	2	60	44	2,634	14.94
2014 Tuscaloosa AL MSA	9.86	23	2,588	11	107	0	0	2	20	36	2,715	2.46

\* Loan Data as of June 30, 2015. Rated area refers to either state or multistate MA rating area.

\*\* The evaluation period for Community Development Loans is from January 01, 2014 to July 13, 2015.

\*\*\* Deposit Data as of June 30, 2014. Rated Area refers to either the state, multistate MA, or institution, as appropriate.

**Table 1. Other Products**

LENDING VOLUME		Geography: ALABAMA						Evaluation Period: JANUARY 1, 2014 TO JUNE 30, 2015						
Assessment Area (2014):	% of Rated Area Loans (#) in MA/AA*	Total Optional Loans**		Small Business Real Estate Secured**		Home Equity**		Motor Vehicle**		Credit Card**		Other Secured Consumer**		% of Rated Area Deposits in AA***
		#	\$ (000's)	#	\$ (000's)	#	\$ (000's)	#	\$ (000's)	#	\$ (000's)	#	\$ (000's)	
<b>Full Review:</b>														
2014 Huntsville AL MSA	11.19	120	160	0	0	0	0	0	0	0	0	0	0	10.77
<b>Limited Review:</b>														
2014 Anniston-Oxford-Jacksonville AL MSA	2.61	28	39	0	0	0	0	0	0	0	0	0	0	4.83
2014 Birmingham-Hoover AL MSA	22.48	241	314	0	0	0	0	0	0	0	0	0	0	22.22
2014 Cullman and Marshall Counties AL	7.00	75	94	0	0	0	0	0	0	0	0	0	0	8.63
2014 Daphne-Fairhope-Foley AL MSA	4.66	50	63	0	0	0	0	0	0	0	0	0	0	8.89
2014 Decatur AL MSA	5.22	56	68	0	0	0	0	0	0	0	0	0	0	4.58
2014 Mobile AL MSA	16.60	178	218	0	0	0	0	0	0	0	0	0	0	10.75
2014 Montgomery AL MSA	11.94	128	166	0	0	0	0	0	0	0	0	0	0	11.93
2014 Southern Non-MSA AL	10.73	115	148	0	0	0	0	0	0	0	0	0	0	14.94
2014 Tuscaloosa AL MSA	7.56	81	92	0	0	0	0	0	0	0	0	0	0	2.46

\* Loan Data as of June 30, 2015. Rated area refers to either state or multistate MA rating area.

\*\* The evaluation period for Optional Product Line(s) is from January 01, 2014 to June 30, 2015.

\*\*\* Deposit Data as of June 30, 2014. Rated Area refers to either the state, multistate MA, or institution, as appropriate.

**Table 1. Other Products**

LENDING VOLUME	Geography: ALABAMA		Evaluation Period: JANUARY 1, 2014 TO JUNE 30, 2015	
Assessment Area (2014):	Other Unsecured Consumer Loans*		Other Optional Loans*	
	#	\$ (000's)	#	\$ (000's)
<b>Full Review:</b>				
2014 Huntsville AL MSA	120	160	0	0
<b>Limited Review:</b>				
2014 Anniston-Oxford-Jacksonville AL MSA	28	39	0	0
2014 Birmingham-Hoover AL MSA	241	314	0	0
2014 Cullman and Marshall Counties AL	75	94	0	0
2014 Daphne-Fairhope-Foley AL MSA	50	63	0	0
2014 Decatur AL MSA	56	68	0	0
2014 Mobile AL MSA	178	218	0	0
2014 Montgomery AL MSA	128	166	0	0
2014 Southern Non-MSA AL	115	148	0	0
2014 Tuscaloosa AL MSA	81	92	0	0

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\* The evaluation period for Optional Product Line(s) is from January 01, 2014 to June 30, 2015.

**Table 4. Geographic Distribution of Home Mortgage Refinance Loans**

Geographic Distribution: HOME MORTGAGE REFINANCE			Geography: ALABAMA						Evaluation Period: JANUARY 1, 2014 TO JUNE 30, 2015						
Assessment Area:	Total Home Mortgage Refinance Loans		Low-Income Geographies		Moderate-Income Geographies		Middle-Income Geographies		Upper-Income Geographies		Market Share (%) by Geography <sup>1</sup>				
	#	% of Total <sup>2</sup>	% Owner Occ Units <sup>3</sup>	% BANK Loans <sup>4</sup>	% Owner Occ Units <sup>3</sup>	% BANK Loans	% Owner Occ Units <sup>3</sup>	% BANK Loans	% Owner Occ Units <sup>3</sup>	% BANK Loans	Overall	Low	Mod	Mid	Upp
<b>Full Review:</b>															
2014 Huntsville AL MSA	33	13.41	3.59	0.00	23.58	21.21	39.46	45.45	33.38	33.33	0.57	0.00	0.38	0.61	0.65
<b>Limited Review:</b>															
2014 Anniston-Oxford-Jacksonville AL MSA	10	4.07	3.90	0.00	16.74	20.00	46.62	30.00	32.74	50.00	0.42	0.00	0.92	0.00	0.79
2014 Birmingham-Hoover AL MSA	37	15.04	5.37	5.41	16.69	16.22	34.75	27.03	43.19	51.35	0.41	0.61	0.79	0.38	0.36
2014 Cullman and Marshall Counties AL	22	8.94	0.00	0.00	5.18	0.00	58.97	50.00	35.85	50.00	0.85	0.00	0.00	0.71	1.16
2014 Daphne-Fairhope-Foley AL MSA	22	8.94	0.00	0.00	15.14	22.73	60.08	63.64	24.78	13.64	0.58	0.00	1.06	0.72	0.16
2014 Decatur AL MSA	23	9.35	1.27	0.00	13.04	8.70	59.45	56.52	26.24	34.78	0.78	0.00	0.00	0.64	1.31
2014 Mobile AL MSA	24	9.76	4.02	0.00	19.63	20.83	40.72	37.50	35.63	41.67	0.79	0.00	1.45	0.72	0.69
2014 Montgomery AL MSA	28	11.38	6.15	0.00	17.57	10.71	40.49	50.00	35.79	39.29	0.66	0.00	0.00	0.90	0.63
2014 Southern Non-MSA AL	24	9.76	1.39	0.00	22.02	29.17	47.68	41.67	28.91	29.17	1.00	0.00	2.01	1.17	0.52
2014 Tuscaloosa AL MSA	23	9.35	4.09	4.35	12.85	8.70	41.61	56.52	41.45	30.43	0.63	0.00	0.48	1.04	0.37

\* Based on 2014 Peer Mortgage Data – US and PR

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

\*\*\* Percentage of Owner Occupied Units is the number of owner occupied units in a particular geography divided by the number of owner occupied housing units in the area based on 2010 Census information.

\*\*\*\* Data shown includes only One to Four-family and manufactured housing. (Property type of 1 or 2)

**Table 6. Geographic Distribution of Small Loans to Businesses**

Geographic Distribution: SMALL LOANS TO BUSINESSES															Geography: ALABAMA					Evaluation Period: JANUARY 1, 2014 TO JUNE 30, 2015				
Assessment Area:	Total Small Business Loans		Low-Income Geographies		Moderate-Income Geographies		Middle-Income Geographies		Upper-Income Geographies		Market Share (%) by Geography													
	#	% of Total**	% of Businesses***	% BANK Loans	% of Businesses***	% BANK Loans	% of Businesses***	% BANK Loans	% of Businesses***	% BANK Loans	% of Businesses***	% BANK Loans	Overall	Low	Mod	Mid	Upp							
<b>Full Review:</b>																								
2014 Huntsville AL MSA	9	9.68	10.11	0.00	25.20	33.33	33.92	33.33	30.77	33.33	0.12	0.00	0.19	0.16	0.09									
<b>Limited Review:</b>																								
2014 Anniston-Oxford-Jacksonville AL MSA	1	1.08	5.12	0.00	26.64	0.00	44.42	100.00	23.24	0.00	0.10	0.00	0.00	0.26	0.00									
2014 Birmingham-Hoover AL MSA	23	24.73	8.79	8.70	17.71	21.74	29.43	30.43	44.06	39.13	0.10	0.09	0.20	0.11	0.08									
2014 Cullman and Marshall Counties AL	3	3.23	0.00	0.00	4.59	0.00	56.38	66.67	39.03	33.33	0.17	0.00	0.00	0.22	0.14									
2014 Daphne-Fairhope-Foley AL MSA	9	9.68	0.00	0.00	10.01	0.00	68.40	66.67	21.59	33.33	0.19	0.00	0.00	0.21	0.21									
2014 Decatur AL MSA	5	5.38	0.96	0.00	18.61	0.00	57.74	100.00	22.69	0.00	0.22	0.00	0.00	0.42	0.00									
2014 Mobile AL MSA	12	12.90	6.51	16.67	20.91	33.33	33.89	16.67	38.47	33.33	0.11	0.52	0.08	0.05	0.11									
2014 Montgomery AL MSA	3	3.23	15.45	0.00	16.29	33.33	31.95	0.00	36.31	66.67	0.02	0.00	0.00	0.00	0.05									
2014 Southern Non-MSA AL	17	18.28	4.47	5.88	25.51	17.65	40.18	23.53	29.84	52.94	0.88	1.01	0.54	0.52	1.72									
2014 Tuscaloosa AL MSA	11	11.83	7.25	0.00	22.96	18.18	36.87	54.55	32.92	27.27	0.31	0.00	0.32	0.35	0.32									

\* Based on 2014 Peer Small Business Data – US and PR

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

\*\*\* Source Data - Dun and Bradstreet (2014).



**Table 10. Borrower Distribution of Home Mortgage Refinance Loans**

Borrower Distribution: HOME MORTGAGE REFINANCE				Geography: ALABAMA				Evaluation Period: JANUARY 1, 2014 TO JUNE 30, 2015							
Assessment Area:	Total Home Mortgage Refinance Loans		Low-Income Borrowers		Moderate-Income Borrowers		Middle-Income Borrowers		Upper-Income Borrowers		Market Share <sup>1</sup>				
	#	% of Total <sup>**</sup>	% Families <sup>***</sup>	% BANK Loans <sup>****</sup>	% Families <sup>19</sup>	% BANK Loans <sup>****</sup>	% Families <sup>***</sup>	% BANK Loans <sup>****</sup>	% Families <sup>***</sup>	% BANK Loans <sup>****</sup>	Overall	Low	Mod	Mid	Upp
<b>Full Review:</b>															
2014 Huntsville AL MSA	33	13.41	22.84	30.30	16.80	15.15	18.52	27.27	41.84	27.27	0.80	1.28	0.81	1.01	0.59
<b>Limited Review:</b>															
2014 Anniston-Oxford-Jacksonville AL MSA	10	4.07	22.91	20.00	18.01	30.00	18.61	30.00	40.48	20.00	0.54	1.52	2.05	0.00	0.00
2014 Birmingham-Hoover AL MSA	37	15.04	21.47	21.62	16.46	21.62	18.85	16.22	43.22	40.54	0.53	1.67	0.39	0.40	0.43
2014 Cullman and Marshall Counties AL	22	8.94	19.67	13.64	16.03	45.45	18.99	18.18	45.31	22.73	1.02	2.50	4.21	0.00	0.31
2014 Daphne-Fairhope-Foley AL MSA	22	8.94	19.39	22.73	18.64	22.73	21.54	18.18	40.43	36.36	0.73	2.21	1.65	0.27	0.25
2014 Decatur AL MSA	23	9.35	20.98	8.70	18.25	26.09	20.44	26.09	40.33	39.13	0.97	0.00	1.52	1.09	0.91
2014 Mobile AL MSA	24	9.76	23.24	16.67	16.71	37.50	19.49	16.67	40.56	29.17	1.08	2.55	1.93	1.05	0.58
2014 Montgomery AL MSA	28	11.38	23.58	17.86	16.47	28.57	18.55	28.57	41.39	25.00	0.91	1.02	1.51	1.25	0.51
2014 Southern Non-MSA AL	24	9.76	24.42	0.00	16.68	16.67	16.52	29.17	42.37	54.17	1.36	0.00	2.16	2.11	1.05
2014 Tuscaloosa AL MSA	23	9.35	19.84	4.35	16.14	30.43	19.79	34.78	44.23	30.43	0.87	0.00	2.16	1.24	0.32

\* Based on 2014 Peer Mortgage Data – US and PR

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

\*\*\* Percentage of Families is based on the 2010 Census information.

\*\*\*\* As a percentage of loans with borrower income information available. No information was available for 0.0% of loans originated and purchased by bank.

19 Data shown includes only One to Four-family and manufactured housing. (Property type of 1 or 2)

**Table 11. Borrower Distribution of Small Loans to Businesses**

Borrower Distribution: SMALL LOANS TO BUSINESSES			Geography: ALABAMA		Evaluation Period: JANUARY 1, 2014 TO JUNE 30, 2015				
Assessment Area:	Total Small Loans to Businesses		Businesses With Revenues of \$1 million or less		Loans by Original Amount Regardless of Business Size			Market Share <sup>1</sup>	
	#	% of Total <sup>2</sup>	% of Businesses <sup>3</sup>	% BANK Loans <sup>4</sup>	\$100,000 or less	>\$100,000 to \$250,000	>\$250,000 to \$1,000,000	All	Rev\$ 1 Million or Less
<b>Full Review:</b>									
2014 Huntsville AL MSA	9	9.68	71.13	88.89	100.00	0.00	0.00	0.12	0.20
<b>Limited Review:</b>									
2014 Anniston-Oxford-Jacksonville AL MSA	1	1.08	70.58	100.00	100.00	0.00	0.00	0.10	0.20
2014 Birmingham-Hoover AL MSA	23	24.73	70.73	78.26	86.96	8.70	4.35	0.10	0.15
2014 Cullman and Marshall Counties AL	3	3.23	69.77	100.00	100.00	0.00	0.00	0.17	0.37
2014 Daphne-Fairhope-Foley AL MSA	9	9.68	73.90	100.00	100.00	0.00	0.00	0.19	0.36
2014 Decatur AL MSA	5	5.38	71.19	100.00	100.00	0.00	0.00	0.22	0.44
2014 Mobile AL MSA	12	12.90	70.46	100.00	100.00	0.00	0.00	0.11	0.25
2014 Montgomery AL MSA	3	3.23	69.85	100.00	100.00	0.00	0.00	0.02	0.04
2014 Southern Non-MSA AL	17	18.28	71.29	94.12	94.12	5.88	0.00	0.88	1.81
2014 Tuscaloosa AL MSA	11	11.83	69.46	90.91	100.00	0.00	0.00	0.31	0.63

\* Based on 2014 Peer Small Business Data – US and PR

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

\*\*\* Businesses with revenues of \$1 million or less as a percentage of all businesses (Source D&B - 2014).

\*\*\*\* Small loans to businesses with revenues of \$1 million or less as a percentage of all loans reported as small loans to businesses. No information was available for 5.38% of small loans to businesses originated and purchased by the bank.

**Table 13. Geographic and Borrower Distribution of Consumer Loans**

Geographic and Borrower Distribution: CONSUMER LOANS																		Geography: ALABAMA				Evaluation Period: JANUARY 1, 2014 TO JUNE 30, 2015			
Assessment Area:	Geographic Distribution										Borrower Distribution														
	Total Consumer Loans		Low-Income Geographies		Moderate-Income Geographies		Middle-Income Geographies		Upper-Income Geographies		Low-Income Borrowers		Moderate-Income Borrowers		Middle-Income Borrowers		Upper-Income Borrowers								
	#	% of Total*	% of Hhlds**	% of BANK Loans	% of Hhlds**	% of BANK Loans	% of Hhlds**	% of BANK Loans	% of Hhlds**	% of BANK Loans	% of Hhlds**	% of BANK Loans	% of Hhlds**	% of BANK Loans	% of Hhlds**	% of BANK Loans	% of Hhlds**	% of BANK Loans							
<b>Full Review:</b>																									
Huntsville MSA	120	11.19	8.83	17.50	26.71	29.17	36.41	40.00	28.05	13.33	24.71	67.50	15.96	22.50	16.94	5.83	42.39	4.17							
<b>Limited Review:</b>																									
Anniston-Oxford-Jacksonville	28	2.61	6.18	3.57	20.07	25.00	44.40	42.86	29.30	28.57	26.73	64.29	13.90	25.00	16.80	7.14	42.57	3.57							
Birmingham-Hoover MSA	241	22.48	8.89	12.86	20.40	31.54	33.47	37.34	37.24	18.26	24.16	56.43	15.38	24.90	17.51	12.03	42.95	6.64							
Cullman and Marshall Counties	75	7.00	0.00	0.00	5.56	1.33	61.59	64.00	32.86	34.67	22.01	60.00	15.13	18.67	16.61	9.33	46.25	12.00							
Daphne-Fairhope-Foley	50	4.66	0.00	0.00	14.70	12.00	62.78	72.00	22.52	16.00	22.76	64.00	16.66	24.00	20.20	8.00	40.38	4.00							
Decatur MSA	56	5.22	1.81	3.57	17.80	21.43	56.65	64.29	23.74	10.71	24.55	51.79	15.97	28.57	17.72	12.50	41.76	7.14							
Mobile	178	16.60	6.21	10.67	23.98	34.83	38.52	30.34	31.28	24.16	26.31	47.75	14.69	24.72	16.78	14.61	42.22	12.92							
Montgomery	128	11.94	9.97	14.84	19.48	22.66	38.05	42.19	32.50	20.31	24.63	66.41	15.69	14.06	17.34	15.63	42.34	3.91							
Southern Non-MSA	115	10.73	2.33	2.61	25.15	33.91	44.87	45.22	27.65	18.26	26.23	46.96	14.96	23.48	15.94	21.74	42.87	7.83							
Tuscaloosa MSA	81	7.56	8.27	4.94	19.41	32.10	39.92	38.27	32.40	24.69	25.85	76.54	13.12	18.52	16.03	4.94	45.00	0.00							

\* Consumer Loans originated and purchased in the MA/AA as a percentage of all consumer loans originated and purchased in the rated area.  
 \*\* Percentage of households is based on 2010 Census Information.

**Table 14. Qualified Investments**

QUALIFIED INVESTMENTS		Geography: ALABAMA				Evaluation Period: JUNE 24, 2012 TO JULY 13, 2015			
Assessment Area:	Prior Period Investments*		Current Period Investments		Total Investments			Unfunded Commitments**	
	#	\$(000's)	#	\$(000's)	#	\$(000's)	% of Total	#	\$(000's)
<b>Full Review:</b>									
2014 Huntsville AL MSA	0	0	4	396	4	396	0.00	0	0
<b>Limited Review:</b>									
2014 Anniston-Oxford-Jacksonville AL MSA	0	0	1	85	1	85	0.00	0	0
2014 Birmingham-Hoover AL MSA	1	9	7	262	8	269	0.00	0	0
2014 Cullman and Marshall Counties AL	0	0	1	148	1	148	0.00	0	0
2014 Daphne-Fairhope-Foley AL MSA	0	0	0	0	0	0	0.00	0	0
2014 Decatur AL MSA	0	0	1	130	1	130	0.00	0	0
2014 Mobile AL MSA	0	0	0	0	0	0	0.00	0	0
2014 Montgomery AL MSA	0	0	5	273	5	273	0.00	0	0
2014 Southern Non-MSA AL	0	0	2	69	2	69	0.00	0	0
2014 Tuscaloosa AL MSA	0	0	3	30	3	30	0.00	0	0

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

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

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

DISTRIBUTION OF BRANCH DELIVERY SYSTEM AND BRANCH OPENINGS/CLOSINGS								Geography: ALABAMA				Evaluation Period: JANUARY 1, 2014 TO JUNE 30, 2015					
MA/Assessment Area:	Deposits	Branches						Branch Openings/Closings				Population					
	% of Rated Area Deposits in AA	# of BANK Branches	% of Rated Area Branches in AA	Location of Branches by Income of Geographies (%)				# of Branch Openings	# of Branch Closings	Net change in Location of Branches (+ or -)				% of Population within Each Geography			
				Low	Mod	Mid	Upp			Low	Mod	Mid	Upp	Low	Mod	Mid	Upp
<b>Full Review:</b>																	
2014 Huntsville AL MSA	10.77	6	15.00	0.00	33.34	66.66	0.00	0	0	0	0	0	0	8.34	25.71	36.81	29.14
<b>Limited Review:</b>																	
2014 Anniston-Oxford-Jacksonville AL MSA	4.83	2	5.00	0.00	50.00	50.00	0.00	0	0	0	0	0	0	5.87	19.90	46.14	28.08
2014 Birmingham-Hoover AL MSA	22.22	8	20.00	0.00	25.00	50.00	25.00	0	1	0	0	0	-1	8.65	19.46	33.07	38.82
2014 Cullman and Marshall Counties AL	8.63	3	7.00	0.00	0.00	66.66	33.34	0	0	0	0	0	0	0.00	5.99	60.80	33.21
2014 Daphne-Fairhope-Foley AL MSA	8.89	3	7.00	0.00	0.00	66.66	33.34	0	0	0	0	0	0	0.00	14.94	63.79	21.27
2014 Decatur AL MSA	4.58	2	5.00	0.00	50.00	50.00	0.00	0	0	0	0	0	0	2.29	17.72	56.86	23.12
2014 Mobile AL MSA	10.75	4	10.00	0.00	50.00	25.00	25.00	0	0	0	0	0	0	6.34	23.70	39.08	30.70
2014 Montgomery AL MSA	11.93	6	15.00	16.66	16.66	16.68	50.00	0	0	0	0	0	0	10.20	18.50	39.08	32.22
2014 Southern Non-MSA AL	14.94	5	11.00	0.00	60.00	20.00	20.00	0	0	0	0	0	0	2.05	25.19	44.61	28.15
2014 Tuscaloosa AL MSA	2.46	2	5.00	0.00	50.00	0.00	50.00	1	0	0	+1	0	0	10.75	18.27	38.55	32.42

## Florida

**Table 1. Lending Volume**

LENDING VOLUME		Geography: FLORIDA				Evaluation Period: JANUARY 1, 2014 TO JUNE 30, 2015						
Assessment Area (2014):	% of Rated Area Loans (#) in MA/AA*	Home Mortgage		Small Loans to Businesses		Small Loans to Farms		Community Development Loans**		Total Reported Loans		% of Rated Area Deposits in MA/AA***
		#	\$ (000's)	#	\$ (000's)	#	\$ (000's)	#	\$ (000's)	#	\$(000's)	
<b>Full Review:</b>												
2014 Jacksonville FL MSA	48.19	26	3,156	12	130	0	0	2	20	40	3,306	19.87
<b>Limited Review:</b>												
2014 Ocala FL MSA	15.66	11	1,296	2	127	0	0	0	0	13	1,423	21.71
2014 Pensacola-Ferry Pass-Brent FL MSA	27.09	8	1,015	12	18	0	0	2	30	22	1,063	25.87
2014 Tampa-St Petersburg-Clearwater FL MSA	9.64	6	463	1	1	0	0	1	10	8	474	32.55

\* Loan Data as of June 30, 2015. Rated area refers to either state or multistate MA rating area.

\*\* The evaluation period for Community Development Loans is from January 01, 2014 to July 13, 2015.

\*\*\* Deposit Data as of June 30, 2014. Rated Area refers to either the state, multistate MA, or institution, as appropriate.

**Table 1. Other Products**

LENDING VOLUME		Geography: FLORIDA				Evaluation Period: JANUARY 1, 2014 TO JUNE 30, 2015								
Assessment Area (2014):	% of Rated Area Loans (#) in MA/AA <sup>1</sup>	Total Optional Loans <sup>**</sup>		Small Business Real Estate Secured <sup>**</sup>		Home Equity <sup>**</sup>		Motor Vehicle <sup>**</sup>		Credit Card <sup>**</sup>		Other Secured Consumer <sup>**</sup>		% of Rated Area Deposits in AA <sup>***</sup>
		#	\$ (000's)	#	\$ (000's)	#	\$ (000's)	#	\$ (000's)	#	\$ (000's)	#	\$ (000's)	
<b>Full Review:</b>														
2014 Jacksonville FL MSA	55.13	86	100	0	0	0	0	0	0	0	0	0	0	19.87
<b>Limited Review:</b>														
2014 Ocala FL MSA	18.59	29	29	0	0	0	0	0	0	0	0	0	0	21.71
2014 Pensacola-Ferry Pass-Brent FL MSA	16.67	26	33	0	0	0	0	0	0	0	0	0	0	25.87
2014 Tampa-St Petersburg-Clearwater FL MSA	9.62	15	18	0	0	0	0	0	0	0	0	0	0	32.55

<sup>1</sup> Loan Data as of June 30, 2015. Rated area refers to either state or multistate MA rating area.

<sup>\*\*</sup> The evaluation period for Optional Product Line(s) is from January 01, 2014 to June 30, 2015.

<sup>\*\*\*</sup> Deposit Data as of June 30, 2014. Rated Area refers to either the state, multistate MA, or institution, as appropriate.

**Table 1. Other Products**

LENDING VOLUME		Geography: FLORIDA		Evaluation Period: JANUARY 1, 2014 TO JUNE 30, 2015	
Assessment Area (2014):	Other Unsecured Consumer Loans <sup>1</sup>		Other Optional Loans <sup>*</sup>		
	#	\$ (000's)	#	\$ (000's)	
<b>Full Review:</b>					
2014 Jacksonville FL MSA	86	100	0	0	
<b>Limited Review:</b>					
2014 Ocala FL MSA	29	29	0	0	
2014 Pensacola-Ferry Pass-Brent FL MSA	26	33	0	0	
2014 Tampa-St Petersburg-Clearwater FL MSA	15	18	0	0	

<sup>1</sup> The evaluation period for Optional Product Line(s) is from January 01, 2014 to June 30, 2015.



**Table 4. Geographic Distribution of Home Mortgage Refinance Loans**

Geographic Distribution: HOME MORTGAGE REFINANCE			Geography: FLORIDA				Evaluation Period: JANUARY 1, 2014 TO JUNE 30, 2015					Market Share (%) by Geography				
Assessment Area:	Total Home Mortgage Refinance Loans		Low-Income Geographies		Moderate-Income Geographies		Middle-Income Geographies		Upper-Income Geographies		Overall	Low	Mod	Mid	Upp	
	#	% of Total**	% Owner Occ Units***	% BANK Loans****	% Owner Occ Units***	% BANK Loans	% Owner Occ Units***	% BANK Loans	% Owner Occ Units***	% BANK Loans						
<b>Full Review:</b>																
2014 Jacksonville FL MSA	24	50.00	4.76	0.00	20.61	29.17	42.35	45.83	32.28	25.00	0.34	0.00	0.72	0.32	0.23	
<b>Limited Review:</b>																
2014 Ocala FL MSA	10	20.83	0.00	0.00	13.04	0.00	73.07	70.00	13.89	30.00	0.53	0.00	0.00	0.51	0.89	
2014 Pensacola-Ferry Pass-Brent FL MSA	8	16.67	0.98	0.00	17.93	0.00	49.83	37.50	31.26	62.50	0.21	0.00	0.00	0.16	0.32	
2014 Tampa-St Petersburg-Clearwater FL MSA	6	12.50	0.00	0.00	32.60	50.00	63.89	50.00	3.52	0.00	0.56	0.00	1.02	0.41	0.00	

\* Based on 2014 Peer Mortgage Data – US and PR

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

\*\*\* Percentage of Owner Occupied Units is the number of owner occupied units in a particular geography divided by the number of owner occupied housing units in the area based on 2010 Census information.

\*\*\*\* Data shown includes only One to Four-family and manufactured housing. (Property type of 1 or 2)

**Table 6. Geographic Distribution of Small Loans to Businesses**

Geographic Distribution: SMALL LOANS TO BUSINESSES												Geography: FLORIDA				Evaluation Period: JANUARY 1, 2014 TO JUNE 30, 2015				
Assessment Area:	Total Small Business Loans		Low-Income Geographies		Moderate-Income Geographies		Middle-Income Geographies		Upper-Income Geographies		Market Share (%) by Geography									
	#	% of Total**	% of Businesses***	% BANK Loans	% of Businesses***	% BANK Loans	% of Businesses***	% BANK Loans	% of Businesses***	% BANK Loans	Overall	Low	Mod	Mid	Upp					
<b>Full Review:</b>																				
2014 Jacksonville FL MSA	12	44.44	5.10	8.33	24.91	41.67	37.45	50.00	32.55	0.00	0.06	0.14	0.08	0.08	0.00					
<b>Limited Review:</b>																				
2014 Ocala FL MSA	2	7.41	0.00	0.00	17.55	100.00	55.73	0.00	26.72	0.00	0.00	0.00	0.00	0.00	0.00					
2014 Pensacola-Ferry Pass-Brent FL MSA	12	44.44	2.13	0.00	24.10	25.00	44.31	50.00	29.46	25.00	0.20	0.00	0.18	0.24	0.17					
2014 Tampa-St Petersburg-Clearwater FL MSA	1	3.70	0.00	0.00	36.57	0.00	59.06	100.00	4.36	0.00	0.04	0.00	0.00	0.08	0.00					

\* Based on 2014 Peer Small Business Data – US and PR

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

\*\*\* Source Data - Dun and Bradstreet (2014).

**Table 10. Borrower Distribution of Home Mortgage Refinance Loans**

Borrower Distribution: HOME MORTGAGE REFINANCE			Geography: FLORIDA				Evaluation Period: JANUARY 1, 2014 TO JUNE 30, 2015					Market Share <sup>1</sup>				
Assessment Area:	Total Home Mortgage Refinance Loans		Low-Income Borrowers		Moderate-Income Borrowers		Middle-Income Borrowers		Upper-Income Borrowers		Overall	Low	Mod	Mid	Upp	
	#	% of Total**	% Families***	% BANK Loans****	% Families <sup>20</sup>	% BANK Loans****	% Families***	% BANK Loans****	% Families***	% BANK Loans****						
<b>Full Review:</b>																
2014 Jacksonville FL MSA	24	50.00	23.20	20.83	18.23	37.50	21.81	20.83	36.76	20.83	0.46	0.67	1.03	0.41	0.23	
<b>Limited Review:</b>																
2014 Ocala FL MSA	10	20.83	18.09	20.00	19.80	40.00	22.83	10.00	39.28	30.00	0.65	1.46	1.56	0.00	0.52	
2014 Pensacola-Ferry Pass-Brent FL MSA	8	16.67	21.14	0.00	17.61	25.00	20.81	12.50	40.43	62.50	0.28	0.00	0.42	0.15	0.35	
2014 Tampa-St Petersburg-Clearwater FL MSA	6	12.50	22.86	16.67	22.94	33.33	21.56	50.00	32.64	0.00	0.75	0.80	1.04	1.46	0.00	

\* Based on 2014 Peer Mortgage Data – US and PR

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

\*\*\* Percentage of Families is based on the 2010 Census information.

\*\*\*\* As a percentage of loans with borrower income information available. No information was available for 0.0% of loans originated and purchased by bank.

<sup>20</sup> Data shown includes only One to Four-family and manufactured housing. (Property type of 1 or 2)

**Table 11. Borrower Distribution of Small Loans to Businesses**

Borrower Distribution: SMALL LOANS TO BUSINESSES			Geography: FLORIDA		Evaluation Period: JANUARY 1, 2014 TO JUNE 30, 2015				
Assessment Area:	Total Small Loans to Businesses		Businesses With Revenues of \$1 million or less		Loans by Original Amount Regardless of Business Size			Market Share <sup>1</sup>	
	#	% of Total <sup>**</sup>	% of Businesses <sup>***</sup>	% BANK Loans <sup>****</sup>	\$100,000 or less	>\$100,000 to \$250,000	>\$250,000 to \$1,000,000	All	Rev\$ 1 Million or Less
<b>Full Review:</b>									
2014 Jacksonville FL MSA	12	44.44	69.12	91.67	91.67	8.33	0.00	0.06	0.10
<b>Limited Review:</b>									
2014 Ocala FL MSA	2	7.41	74.91	50.00	50.00	50.00	0.00	0.00	0.00
2014 Pensacola-Ferry Pass-Brent FL MSA	12	44.44	74.00	100.00	100.00	0.00	0.00	0.20	0.42
2014 Tampa-St Petersburg-Clearwater FL MSA	1	3.70	75.06	100.00	100.00	0.00	0.00	0.04	0.08

\* Based on 2014 Peer Small Business Data – US and PR

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

\*\*\* Businesses with revenues of \$1 million or less as a percentage of all businesses (Source D&B - 2014).

\*\*\*\* Small loans to businesses with revenues of \$1 million or less as a percentage of all loans reported as small loans to businesses. No information was available for 7.41% of small loans to businesses originated and purchased by the bank.

**Table 13. Geographic and Borrower Distribution of Consumer Loans**

Geographic and Borrower Distribution: CONSUMER LOANS																		Geography: FLORIDA				Evaluation Period: JANUARY 1, 2014 TO JUNE 30, 2015			
Assessment Area:	Geographic Distribution										Borrower Distribution														
	Total Consumer Loans		Low-Income Geographies		Moderate-Income Geographies		Middle-Income Geographies		Upper-Income Geographies		Low-Income Borrowers		Moderate-Income Borrowers		Middle-Income Borrowers		Upper-Income Borrowers								
	#	% of Total	% of Hhlds**	% of BANK Loans	% of Hhlds**	% of BANK Loans	% of Hhlds**	% of BANK Loans	% of Hhlds**	% of BANK Loans	% of Hhlds**	% of BANK Loans	% of Hhlds**	% of BANK Loans	% of Hhlds**	% of BANK Loans	% of Hhlds**	% of BANK Loans							
<b>Full Review:</b>																									
2014 Jacksonville FL MSA	86	55.13	7.16	27.91	25.57	34.88	39.82	33.72	27.44	3.49	25.54	63.95	17.54	19.77	18.94	11.63	37.98	4.65							
<b>Limited Review:</b>																									
2014 Ocala FL MSA	29	18.59	0.00	0.00	16.23	24.14	69.03	72.41	14.75	3.45	21.56	58.62	17.50	31.03	20.42	6.90	40.52	3.45							
2014 Pensacola-Ferry Pass-Brent FL MSA	26	16.67	1.81	0.00	23.13	34.62	48.17	50.00	26.89	15.38	23.67	46.15	16.51	19.23	18.40	30.77	41.41	3.85							
2014 Tampa-St Petersburg-Clearwater FL MSA	15	9.62	0.00	0.00	35.03	53.33	61.60	46.67	3.37	0.00	24.05	60.00	19.75	40.00	20.05	0.00	36.16	0.00							

\* Consumer Loans originated and purchased in the MA/AA as a percentage of all consumer loans originated and purchased in the rated area.  
 \*\* Percentage of households is based on 2010 Census Information.

**Table 14. Qualified Investments**

QUALIFIED INVESTMENTS		Geography: FLORIDA				Evaluation Period: JUNE 24, 2012 TO JULY 13, 2015			
Assessment Area:	Prior Period Investments'		Current Period Investments		Total Investments			Unfunded Commitments''	
	#	\$(000's)	#	\$(000's)	#	\$(000's)	% of Total	#	\$(000's)
<b>Full Review:</b>									
2014 Jacksonville FL MSA	0	0	5	334	5	334	36.22	0	0
<b>Limited Review:</b>									
2014 Ocala FL MSA	0	0	4	340	4	340	36.88	0	0
2014 Pensacola-Ferry Pass-Brent FL MSA	1	107	3	134	4	241	26.14	0	0
2014 Tampa-St Petersburg-Clearwater FL MSA	0	0	3	7	3	7	0.76	0	0

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

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

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

DISTRIBUTION OF BRANCH DELIVERY SYSTEM AND BRANCH OPENINGS/CLOSINGS																	Geography: FLORIDA				Evaluation Period: JANUARY 1, 2014 TO JUNE 30, 2015			
MA/Assessment Area:	Deposits	Branches						Branch Openings/Closings						Population										
	% of Rated Area Deposits in AA	# of BANK Branches	% of Rated Area Branches in AA	Location of Branches by Income of Geographies (%)				# of Branch Openings	# of Branch Closings	Net change in Location of Branches (+ or -)				% of Population within Each Geography										
				Low	Mod	Mid	Upp			Low	Mod	Mid	Upp	Low	Mod	Mid	Upp							
<b>Full Review:</b>																								
2014 Jacksonville FL MSA	19.87	3	100.00	0.00	66.67	33.33	0.00	0	0	0	0	0	0	7.14	24.63	40.55	27.68							
<b>Limited Review:</b>																								
2014 Ocala FL MSA	21.71	0	0.00	0.00	0.00	0.00	0.00	0	1	0	0	0	-1	0.00	16.88	67.81	15.31							
2014 Pensacola-Ferry Pass-Brent FL MSA	25.87	0	0.00	0.00	0.00	0.00	0.00	0	1	0	0	-1	0	1.67	22.17	49.75	26.41							
2014 Tampa-St Petersburg-Clearwater FL MSA	32.55	0	0.00	0.00	0.00	0.00	0.00	0	1	0	0	-1	0	0.00	33.38	62.81	3.82							

Georgia

**Table 1. Lending Volume**

LENDING VOLUME		Geography: GEORGIA				Evaluation Period: JANUARY 1, 2014 TO JUNE 30, 2015						
Assessment Area (2014):	% of Rated Area Loans (#) in MA/AA'	Home Mortgage		Small Loans to Businesses		Small Loans to Farms		Community Development Loans**		Total Reported Loans		% of Rated Area Deposits in MA/AA***
		#	\$ (000's)	#	\$ (000's)	#	\$ (000's)	#	\$ (000's)	#	\$(000's)	
<b>Full Review:</b>												
2014 Atlanta-Sandy Springs-Roswell GA MSA	100.00	28	2,657	36	674	0	0	4	49	68	3,380	87.99
<b>Limited Review:</b>												
2014 Macon GA MSA	0.00	0	0	0	0	0	0	0	0	0	0	12.01

**Table 1. Other Products**

LENDING VOLUME		Geography: GEORGIA				Evaluation Period: JANUARY 1, 2014 TO JUNE 30, 2015								
Assessment Area (2014):	% of Rated Area Loans (#) in MA/AA'	Total Optional Loans**		Small Business Real Estate Secured**		Home Equity**		Motor Vehicle**		Credit Card**		Other Secured Consumer**		% of Rated Area Deposits in AA***
		#	\$ (000's)	#	\$ (000's)	#	\$ (000's)	#	\$ (000's)	#	\$ (000's)	#	\$(000's)	
<b>Full Review:</b>														
2014 Atlanta-Sandy Springs-Roswell GA MSA	98.09	205	265	0	0	0	0	0	0	0	0	0	0	87.99
<b>Limited Review:</b>														
2014 Macon GA MSA	1.91	4	5	0	0	0	0	0	0	0	0	0	0	12.01

\* Loan Data as of June 30, 2015. Rated area refers to either state or multistate MA rating area.  
 \*\* The evaluation period for Community Development Loans is from January 01, 2014 to July 13, 2015.  
 \*\*\* Deposit Data as of June 30, 2014. Rated Area refers to either the state, multistate MA, or institution, as appropriate.  
 \* Loan Data as of June 30, 2015. Rated area refers to either state or multistate MA rating area.  
 \*\* The evaluation period for Optional Product Line(s) is from January 01, 2014 to June 30, 2015.  
 \*\*\* Deposit Data as of June 30, 2014. Rated Area refers to either the state, multistate MA, or institution, as appropriate.



**Table 1. Other Products**

LENDING VOLUME		Geography: GEORGIA		Evaluation Period: JANUARY 1, 2014 TO JUNE 30, 2015	
Assessment Area (2014):	Other Unsecured Consumer Loans <sup>*</sup>		Other Optional Loans <sup>*</sup>		
	#	\$ (000's)	#	\$ (000's)	
<b>Full Review:</b>					
2014 Atlanta-Sandy Springs-Roswell GA MSA	205	265	0	0	
<b>Limited Review:</b>					
2014 Macon GA MSA	4	5	0	0	

**Table 4. Geographic Distribution of Home Mortgage Refinance Loans**

Geographic Distribution: HOME MORTGAGE REFINANCE		Geography: GEORGIA				Evaluation Period: JANUARY 1, 2014 TO JUNE 30, 2015									
Assessment Area:	Total Home Mortgage Refinance Loans		Low-Income Geographies		Moderate-Income Geographies		Middle-Income Geographies		Upper-Income Geographies		Market Share (%) by Geography <sup>†</sup>				
	#	% of Total <sup>**</sup>	% Owner Occ Units <sup>***</sup>	% BANK Loans <sup>****</sup>	% Owner Occ Units <sup>***</sup>	% BANK Loans	% Owner Occ Units <sup>***</sup>	% BANK Loans	% Owner Occ Units <sup>***</sup>	% BANK Loans	Overall	Low	Mod	Mid	Upp
<b>Full Review:</b>															
2014 Atlanta-Sandy Springs-Roswell GA MSA	26	100.00	4.68	7.69	19.35	26.92	35.19	30.77	40.78	34.62	0.09	0.28	0.17	0.09	0.07
<b>Limited Review:</b>															
2014 Macon GA MSA	0	0.00	0.00	0.00	16.23	0.00	39.04	0.00	44.72	0.00	0.00	0.00	0.00	0.00	0.00

\* The evaluation period for Optional Product Line(s) is from January 01, 2014 to June 30, 2015.

\* Based on 2014 Peer Mortgage Data – US and PR

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

\*\*\* Percentage of Owner Occupied Units is the number of owner occupied units in a particular geography divided by the number of owner occupied housing units in the area based on 2010 Census information.

\*\*\*\* Data shown includes only One to Four-family and manufactured housing. (Property type of 1 or 2)

**Table 6. Geographic Distribution of Small Loans to Businesses**

Geographic Distribution: SMALL LOANS TO BUSINESSES			Geography: GEORGIA						Evaluation Period: JANUARY 1, 2014 TO JUNE 30, 2015								
Assessment Area:	Total Small Business Loans		Low-Income Geographies		Moderate-Income Geographies		Middle-Income Geographies		Upper-Income Geographies		Market Share (%) by Geography'						
	#	% of Total**	% of Businesses***	% BANK Loans	% of Businesses***	% BANK Loans	% of Businesses***	% BANK Loans	% of Businesses***	% BANK Loans	% of Businesses***	% BANK Loans	Overall	Low	Mod	Mid	Upp
<b>Full Review:</b>																	
2014 Atlanta-Sandy Springs-Roswell GA MSA	36	100.00	6.61	11.11	20.43	33.33	30.64	38.89	42.19	16.67	0.04	0.07	0.07	0.05	0.01		
<b>Limited Review:</b>																	
2014 Macon GA MSA	0	0.00	0.00	0.00	11.17	0.00	44.47	0.00	44.36	0.00	0.00	0.00	0.00	0.00	0.00		

\* Based on 2014 Peer Small Business Data – US and PR

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

\*\*\* Source Data - Dun and Bradstreet (2014).

**Table 10. Borrower Distribution of Home Mortgage Refinance Loans**

Borrower Distribution: HOME MORTGAGE REFINANCE		Geography: GEORGIA						Evaluation Period: JANUARY 1, 2014 TO JUNE 30, 2015							
Assessment Area:	Total Home Mortgage Refinance Loans		Low-Income Borrowers		Moderate-Income Borrowers		Middle-Income Borrowers		Upper-Income Borrowers		Market Share <sup>1</sup>				
	#	% of Total <sup>**</sup>	% Families <sup>***</sup>	% BANK Loans <sup>****</sup>	% Families <sup>21</sup>	% BANK Loans <sup>****</sup>	% Families <sup>***</sup>	% BANK Loans <sup>****</sup>	% Families <sup>***</sup>	% BANK Loans <sup>****</sup>	Overall	Low	Mod	Mid	Upp
<b>Full Review:</b>															
2014 Atlanta-Sandy Springs-Roswell GA MSA	26	100.00	23.17	26.92	16.83	26.92	18.36	15.38	41.65	30.77	0.12	0.40	0.18	0.09	0.07
<b>Limited Review:</b>															
2014 Macon GA MSA	0	0.00	20.53	0.00	15.30	0.00	16.13	0.00	48.04	0.00	0.00	0.00	0.00	0.00	0.00

\* Based on 2014 Peer Mortgage Data – US and PR

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

\*\*\* Percentage of Families is based on the 2010 Census information.

\*\*\*\* As a percentage of loans with borrower income information available. No information was available for 0.0% of loans originated and purchased by bank.

21 Data shown includes only One to Four-family and manufactured housing. (Property type of 1 or 2)

**Table 11. Borrower Distribution of Small Loans to Businesses**

Borrower Distribution: SMALL LOANS TO BUSINESSES			Geography: GEORGIA		Evaluation Period: JANUARY 1, 2014 TO JUNE 30, 2015				
Assessment Area:	Total Small Loans to Businesses		Businesses With Revenues of \$1 million or less		Loans by Original Amount Regardless of Business Size			Market Share <sup>1</sup>	
	#	% of Total <sup>2</sup>	% of Businesses <sup>3</sup>	% BANK Loans <sup>4</sup>	\$100,000 or less	>\$100,000 to \$250,000	>\$250,000 to \$1,000,000	All	Rev\$ 1 Million or Less
<b>Full Review:</b>									
2014 Atlanta-Sandy Springs-Roswell GA MSA	36	100.00	71.24	77.78	86.11	13.89	0.00	0.04	0.05
<b>Limited Review:</b>									
2014 Macon GA MSA	0	0.00	75.35	0.00	0.00	0.00	0.00	0.00	0.00

\* Based on 2014 Peer Small Business Data – US and PR

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

\*\*\* Businesses with revenues of \$1 million or less as a percentage of all businesses (Source D&B - 2014).

\*\*\*\* Small loans to businesses with revenues of \$1 million or less as a percentage of all loans reported as small loans to businesses. No information was available for 11.11% of small loans to businesses originated and purchased by the bank.

**Table 13. Geographic and Borrower Distribution of Consumer Loans**

Geographic and Borrower Distribution: CONSUMER LOANS																			Geography: GEORGIA				Evaluation Period: JANUARY 1, 2014 TO JUNE 30, 2015			
Assessment Area:	Geographic Distribution										Borrower Distribution															
	Total Consumer Loans		Low-Income Geographies		Moderate-Income Geographies		Middle-Income Geographies		Upper-Income Geographies		Low-Income Borrowers		Moderate-Income Borrowers		Middle-Income Borrowers		Upper-Income Borrowers									
	#	% of Total	% of Hhlds**	% of BANK Loans	% of Hhlds**	% of BANK Loans	% of Hhlds**	% of BANK Loans	% of Hhlds**	% of BANK Loans	% of Hhlds**	% of BANK Loans	% of Hhlds**	% of BANK Loans	% of Hhlds**	% of BANK Loans	% of Hhlds**	% of BANK Loans								
<b>Full Review:</b>																										
2014 Atlanta-Sandy Springs-Roswell GA MSA	205	98.09	10.15	19.02	24.44	41.95	30.91	32.20	34.50	6.83	24.12	54.15	17.25	29.76	17.66	10.73	40.96	5.37								
<b>Limited Review:</b>																										
2014 Macon GA MSA	4	1.91	0.00	0.00	17.40	0.00	41.95	75.00	40.65	25.00	17.62	75.00	16.25	0.00	16.35	25.00	49.78	0.00								

**Table 14. Qualified Investments**

QUALIFIED INVESTMENTS										Geography: GEORGIA				Evaluation Period: JUNE 24, 2012 TO JULY 13, 2015			
Assessment Area:	Prior Period Investments'		Current Period Investments		Total Investments			Unfunded Commitments**									
	#	\$(000's)	#	\$(000's)	#	\$(000's)	% of Total	#	\$(000's)								
<b>Full Review:</b>																	
2014 Atlanta-Sandy Springs-Roswell GA MSA	0	0	10	301	10	301	81.57	0	0								
<b>Limited Review:</b>																	
2014 Macon GA MSA	0	0	1	68	1	68	18.43	0	0								

\* Consumer Loans originated and purchased in the MA/AA as a percentage of all consumer loans originated and purchased in the rated area.

\*\* Percentage of households is based on 2010 Census Information.

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

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

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

DISTRIBUTION OF BRANCH DELIVERY SYSTEM AND BRANCH OPENINGS/CLOSINGS																	
Geography: GEORGIA Evaluation Period: JANUARY 1, 2014 TO JUNE 30, 2015																	
MA/Assessment Area:	Deposits	Branches						Branch Openings/Closings						Population			
	% of Rated Area Deposits in AA	# of BANK Branches	% of Rated Area Branches in AA	Location of Branches by Income of Geographies (%)				# of Branch Openings	# of Branch Closings	Net change in Location of Branches (+ or -)				% of Population within Each Geography			
				Low	Mod	Mid	Upp			Low	Mod	Mid	Upp	Low	Mod	Mid	Upp
<b>Full Review:</b>																	
2014 Atlanta-Sandy Springs-Roswell GA MSA	87.99	8	100.00	12.50	37.50	50.00	0.00	0	0	0	0	0	0	9.90	24.65	32.28	32.98
<b>Limited Review:</b>																	
2014 Macon GA MSA	12.01	0	0.00	0.00	0.00	0.00	0.00	0	1	0	0	0	-1	0.00	16.02	45.02	38.96

Illinois

**Table 1. Lending Volume**

LENDING VOLUME		Geography: ILLINOIS				Evaluation Period: JANUARY 1, 2014 TO JUNE 30, 2015						
Assessment Area (2014):	% of Rated Area Loans (#) in MA/AA*	Home Mortgage		Small Loans to Businesses		Small Loans to Farms		Community Development Loans**		Total Reported Loans		% of Rated Area Deposits in MA/AA***
		#	\$ (000's)	#	\$ (000's)	#	\$ (000's)	#	\$ (000's)	#	\$(000's)	
<b>Full Review:</b>												
2014 Northern Non-MSA IL	10.67	21	2,487	10	18	0	0	1	100	32	2,605	11.60
<b>Limited Review:</b>												
2014 Bloomington IL MSA	8.33	23	2,645	1	2	0	0	1	25	25	2,672	4.42
2014 Carbondale-Marion IL MSA	2.67	6	765	1	3	0	0	1	10	8	778	6.11
2014 Central Non-MSA IL	6.00	7	501	9	14	0	0	2	27	18	542	10.19
2014 Champaign-Urbana IL MSA	9.33	23	3,035	4	5	0	0	1	10	28	3,050	8.22
2014 Coles County IL	2.00	3	163	2	6	0	0	1	5	6	174	2.71
2014 Crawford County IL	0.33	0	0	1	2	0	0	0	0	1	2	3.14
2014 Danville IL MSA	3.00	4	327	4	5	0	0	1	5	9	337	3.21
2014 Davenport-Moline-Rock Island IL MSA	10.00	23	2,228	6	13	0	0	1	5	30	2,246	4.43
2014 Decatur IL MSA	3.00	7	523	2	2	0	0	0	0	9	525	1.38
2014 Kankakee IL MSA	5.00	9	974	5	7	0	0	1	10	15	991	8.15
2014 Peoria IL MSA	12.33	27	3,245	9	15	0	0	1	50	37	3,310	11.57
2014 Rockford IL MSA	6.00	12	971	5	94	0	0	1	5	18	1,070	4.02
2014 Southern Non-MSA IL	4.67	11	1,060	2	4	0	0	1	10	14	1,074	7.74
2014 Springfield IL MSA	6.67	8	808	11	21	0	0	1	10	20	839	5.83
2014 St Louis IL MSA	10.00	24	2,196	5	27	0	0	1	10	30	2,233	7.26

\* Loan Data as of June 30, 2015. Rated area refers to either state or multistate MA rating area.  
 \*\* The evaluation period for Community Development Loans is from January 01, 2014 to July 13, 2015.  
 \*\*\* Deposit Data as of June 30, 2014. Rated Area refers to either the state, multistate MA, or institution, as appropriate.

**Table 1. Other Products**

LENDING VOLUME		Geography: ILLINOIS				Evaluation Period: JANUARY 1, 2014 TO JUNE 30, 2015								
Assessment Area (2014):	% of Rated Area Loans (#) in MA/AA*	Total Optional Loans**		Small Business Real Estate Secured**		Home Equity**		Motor Vehicle**		Credit Card**		Other Secured Consumer**		% of Rated Area Deposits in AA***
		#	\$ (000's)	#	\$ (000's)	#	\$ (000's)	#	\$ (000's)	#	\$ (000's)	#	\$ (000's)	
<b>Full Review:</b>														
2014 Northern Non-MSA IL	11.72	124	180	0	0	0	0	0	0	0	0	0	0	11.60
<b>Limited Review:</b>														
2014 Bloomington IL MSA	3.59	38	49	0	0	0	0	0	0	0	0	0	0	4.42
2014 Carbondale-Marion IL MSA	3.40	36	48	0	0	0	0	0	0	0	0	0	0	6.11
2014 Central Non-MSA IL	12.76	135	182	0	0	0	0	0	0	0	0	0	0	10.19
2014 Champaign-Urbana IL MSA	8.60	91	120	0	0	0	0	0	0	0	0	0	0	8.22
2014 Coles County IL	2.08	22	24	0	0	0	0	0	0	0	0	0	0	2.71
2014 Crawford County IL	3.02	32	39	0	0	0	0	0	0	0	0	0	0	3.14
2014 Danville IL MSA	3.40	36	47	0	0	0	0	0	0	0	0	0	0	3.21
2014 Davenport-Moline-Rock Island IL MSA	4.73	50	69	0	0	0	0	0	0	0	0	0	0	4.43
2014 Decatur IL MSA	1.80	19	20	0	0	0	0	0	0	0	0	0	0	1.38
2014 Kankakee IL MSA	4.54	48	54	0	0	0	0	0	0	0	0	0	0	8.15
2014 Peoria IL MSA	14.27	151	191	0	0	0	0	0	0	0	0	0	0	11.57
2014 Rockford IL MSA	3.21	34	48	0	0	0	0	0	0	0	0	0	0	4.02
2014 Southern Non-MSA IL	5.10	54	64	0	0	0	0	0	0	0	0	0	0	7.74
2014 Springfield IL MSA	8.03	85	108	0	0	0	0	0	0	0	0	0	0	5.83
2014 St Louis IL MSA	9.74	103	149	0	0	0	0	0	0	0	0	0	0	7.26

\* Loan Data as of June 30, 2015. Rated area refers to either state or multistate MA rating area.

\*\* The evaluation period for Optional Product Line(s) is from January 01, 2014 to June 30, 2015.

\*\*\* Deposit Data as of June 30, 2014. Rated Area refers to either the state, multistate MA, or institution, as appropriate.



**Table 1. Other Products**

LENDING VOLUME	Geography: ILLINOIS		Evaluation Period: JANUARY 1, 2014 TO JUNE 30, 2015	
Assessment Area (2014):	Other Unsecured Consumer Loans*		Other Optional Loans*	
	#	\$ (000's)	#	\$ (000's)
<b>Full Review:</b>				
2014 Northern Non-MSA IL	124	180	0	0
<b>Limited Review:</b>				
2014 Bloomington IL MSA	38	49	0	0
2014 Carbondale-Marion IL MSA	36	48	0	0
2014 Central Non-MSA IL	135	182	0	0
2014 Champaign-Urbana IL MSA	91	120	0	0
2014 Coles County IL	22	24	0	0
2014 Crawford County IL	32	39	0	0
2014 Danville IL MSA	36	47	0	0
2014 Davenport-Moline-Rock Island IL MSA	50	69	0	0
2014 Decatur IL MSA	19	20	0	0
2014 Kankakee IL MSA	48	54	0	0
2014 Peoria IL MSA	151	191	0	0
2014 Rockford IL MSA	34	48	0	0
2014 Southern Non-MSA IL	54	64	0	0
2014 Springfield IL MSA	85	108	0	0
2014 St Louis IL MSA	103	149	0	0

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\* The evaluation period for Optional Product Line(s) is from January 01, 2014 to June 30, 2015.

**Table 2. Geographic Distribution of Home Purchase Loans**

Geographic Distribution: HOME PURCHASE			Geography: ILLINOIS				Evaluation Period: JANUARY 1, 2014 TO JUNE 30, 2015					Market Share (%) by Geography <sup>1</sup>				
Assessment Area:	Total Home Purchase Loans		Low-Income Geographies		Moderate-Income Geographies		Middle-Income Geographies		Upper-Income Geographies		Overall	Low	Mod	Mid	Upp	
	#	% of Total <sup>2</sup>	% Owner Occ Units <sup>3</sup>	% BANK Loans <sup>4</sup>	% Owner Occ Units <sup>3</sup>	% BANK Loans	% Owner Occ Units <sup>3</sup>	% BANK Loans	% Owner Occ Units <sup>3</sup>	% BANK Loans						
<b>Full Review:</b>																
2014 Northern Non-MSA IL	0	0.00	0.44	0.00	5.52	0.00	66.49	0.00	27.56	0.00	0.00	0.00	0.00	0.00	0.00	
<b>Limited Review:</b>																
2014 Bloomington IL MSA	1	50.00	0.65	0.00	13.66	0.00	58.03	100.00	27.66	0.00	0.00	0.00	0.00	0.00	0.00	
2014 Carbondale-Marion IL MSA	0	0.00	1.47	0.00	16.50	0.00	56.07	0.00	25.95	0.00	0.00	0.00	0.00	0.00	0.00	
2014 Central Non-MSA IL	1	50.00	1.18	0.00	15.76	100.00	68.52	0.00	14.54	0.00	0.05	0.00	0.37	0.00	0.00	
2014 Champaign-Urbana IL MSA	0	0.00	1.96	0.00	12.64	0.00	65.35	0.00	20.04	0.00	0.00	0.00	0.00	0.00	0.00	
2014 Coles County IL	0	0.00	0.00	0.00	15.89	0.00	74.27	0.00	9.84	0.00	0.00	0.00	0.00	0.00	0.00	
2014 Crawford County IL	0	0.00	0.00	0.00	0.00	0.00	83.53	0.00	16.47	0.00	0.00	0.00	0.00	0.00	0.00	
2014 Danville IL MSA	0	0.00	2.49	0.00	22.63	0.00	52.33	0.00	22.55	0.00	0.00	0.00	0.00	0.00	0.00	
2014 Davenport-Moline-Rock Island IL MSA	0	0.00	1.53	0.00	16.95	0.00	70.34	0.00	11.19	0.00	0.00	0.00	0.00	0.00	0.00	
2014 Decatur IL MSA	0	0.00	5.23	0.00	18.54	0.00	37.61	0.00	38.63	0.00	0.00	0.00	0.00	0.00	0.00	
2014 Kankakee IL MSA	0	0.00	3.21	0.00	12.30	0.00	63.12	0.00	21.37	0.00	0.00	0.00	0.00	0.00	0.00	
2014 Peoria IL MSA	0	0.00	2.36	0.00	14.02	0.00	60.63	0.00	22.99	0.00	0.00	0.00	0.00	0.00	0.00	
2014 Rockford IL MSA	0	0.00	4.75	0.00	20.52	0.00	46.11	0.00	28.62	0.00	0.00	0.00	0.00	0.00	0.00	
2014 Southern Non-MSA IL	0	0.00	0.58	0.00	38.28	0.00	57.53	0.00	3.62	0.00	0.00	0.00	0.00	0.00	0.00	
2014 Springfield IL MSA	0	0.00	6.00	0.00	16.29	0.00	44.47	0.00	33.23	0.00	0.00	0.00	0.00	0.00	0.00	
2014 St Louis IL MSA	0	0.00	5.02	0.00	16.14	0.00	57.32	0.00	21.52	0.00	0.00	0.00	0.00	0.00	0.00	

\* Based on 2014 Peer Mortgage Data – US and PR

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

\*\*\* Percentage of Owner Occupied Units is the number of owner occupied units in a particular geography divided by the number of owner occupied housing units in the area based on 2010 Census information.

\*\*\*\* Data shown includes only One to Four-family and manufactured housing. (Property type of 1 or 2)

**Table 4. Geographic Distribution of Home Mortgage Refinance Loans**

Geographic Distribution: HOME MORTGAGE REFINANCE			Geography: ILLINOIS								Evaluation Period: JANUARY 1, 2014 TO JUNE 30, 2015				
Assessment Area:	Total Home Mortgage Refinance Loans		Low-Income Geographies		Moderate-Income Geographies		Middle-Income Geographies		Upper-Income Geographies		Market Share (%) by Geography <sup>1</sup>				
	#	% of Total <sup>**</sup>	% Owner Occ Units <sup>***</sup>	% BANK Loans <sup>****</sup>	% Owner Occ Units <sup>***</sup>	% BANK Loans	% Owner Occ Units <sup>***</sup>	% BANK Loans	% Owner Occ Units <sup>***</sup>	% BANK Loans	Overall	Low	Mod	Mid	Upp
<b>Full Review:</b>															
2014 Northern Non-MSA IL	21	10.29	0.44	0.00	5.52	4.76	66.49	61.90	27.56	33.33	0.48	0.00	0.00	0.44	0.60
<b>Limited Review:</b>															
2014 Bloomington IL MSA	21	10.29	0.65	0.00	13.66	9.52	58.03	71.43	27.66	19.05	0.58	0.00	0.00	0.85	0.21
2014 Carbondale-Marion IL MSA	6	2.94	1.47	0.00	16.50	0.00	56.07	33.33	25.95	66.67	0.68	0.00	0.00	0.26	1.85
2014 Central Non-MSA IL	6	2.94	1.18	0.00	15.76	33.33	68.52	50.00	14.54	16.67	0.18	0.00	1.18	0.00	0.00
2014 Champaign-Urbana IL MSA	23	11.27	1.96	4.35	12.64	8.70	65.35	60.87	20.04	26.09	1.05	1.30	0.98	0.97	1.26
2014 Coles County IL	3	1.47	0.00	0.00	15.89	0.00	74.27	100.00	9.84	0.00	1.55	0.00	0.00	1.94	0.00
2014 Crawford County IL	0	0.00	0.00	0.00	0.00	0.00	83.53	0.00	16.47	0.00	0.00	0.00	0.00	0.00	0.00
2014 Danville IL MSA	4	1.96	2.49	0.00	22.63	0.00	52.33	100.00	22.55	0.00	0.59	0.00	0.00	1.13	0.00
2014 Davenport-Moline-Rock Island IL MSA	23	11.27	1.53	0.00	16.95	17.39	70.34	56.52	11.19	26.09	0.60	0.00	0.31	0.55	1.33
2014 Decatur IL MSA	7	3.43	5.23	0.00	18.54	14.29	37.61	42.86	38.63	42.86	0.70	0.00	1.08	0.36	0.90
2014 Kankakee IL MSA	9	4.41	3.21	0.00	12.30	0.00	63.12	88.89	21.37	11.11	0.46	0.00	0.00	0.80	0.00
2014 Peoria IL MSA	26	12.75	2.36	0.00	14.02	11.54	60.63	61.54	22.99	26.92	0.71	0.00	0.47	0.74	0.79
2014 Rockford IL MSA	12	5.88	4.75	0.00	20.52	8.33	46.11	66.67	28.62	25.00	0.28	0.00	0.24	0.28	0.33

\* Based on 2014 Peer Mortgage Data – US and PR

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

\*\*\* Percentage of Owner Occupied Units is the number of owner occupied units in a particular geography divided by the number of owner occupied housing units in the area based on 2010 Census information.

\*\*\*\* Data shown includes only One to Four-family and manufactured housing. (Property type of 1 or 2)

**Table 4. Geographic Distribution of Home Mortgage Refinance Loans**

Geographic Distribution: HOME MORTGAGE REFINANCE			Geography: ILLINOIS				Evaluation Period: JANUARY 1, 2014 TO JUNE 30, 2015					Market Share (%) by Geography				
Assessment Area:	Total Home Mortgage Refinance Loans		Low-Income Geographies		Moderate-Income Geographies		Middle-Income Geographies		Upper-Income Geographies							
	#	% of Total**	% Owner Occ Units***	% BANK Loans****	% Owner Occ Units***	% BANK Loans	% Owner Occ Units***	% BANK Loans	% Owner Occ Units***	% BANK Loans	Overall	Low	Mod	Mid	Upp	
<b>Limited Review:</b>																
2014 Southern Non-MSA IL	11	5.39	0.58	0.00	38.28	36.36	57.53	63.64	3.62	0.00	1.54	0.00	1.94	1.49	0.00	
2014 Springfield IL MSA	8	3.92	6.00	0.00	16.29	37.50	44.47	37.50	33.23	25.00	0.26	0.00	0.68	0.13	0.28	
2014 St Louis IL MSA	24	11.76	5.02	4.17	16.14	20.83	57.32	75.00	21.52	0.00	0.34	1.39	0.65	0.44	0.00	

\* Based on 2014 Peer Mortgage Data – US and PR

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

\*\*\* Percentage of Owner Occupied Units is the number of owner occupied units in a particular geography divided by the number of owner occupied housing units in the area based on 2010 Census information.

\*\*\*\* Data shown includes only One to Four-family and manufactured housing. (Property type of 1 or 2)

**Table 6. Geographic Distribution of Small Loans to Businesses**

Geographic Distribution: SMALL LOANS TO BUSINESSES															Geography: ILLINOIS				Evaluation Period: JANUARY 1, 2014 TO JUNE 30, 2015				
Assessment Area:	Total Small Business Loans		Low-Income Geographies		Moderate-Income Geographies		Middle-Income Geographies		Upper-Income Geographies		Market Share (%) by Geography												
	#	% of Total**	% of Businesses***	% BANK Loans	% of Businesses***	% BANK Loans	% of Businesses***	% BANK Loans	% of Businesses***	% BANK Loans	Overall	Low	Mod	Mid	Upp								
<b>Full Review:</b>																							
2014 Northern Non-MSA IL	10	12.99	0.53	0.00	7.81	10.00	66.27	40.00	25.39	50.00	0.23	0.00	0.43	0.14	0.41								
<b>Limited Review:</b>																							
2014 Bloomington IL MSA	1	1.30	5.46	0.00	9.62	100.00	64.31	0.00	20.04	0.00	0.00	0.00	0.00	0.00	0.00								
2014 Carbondale-Marion IL MSA	1	1.30	2.80	0.00	39.87	0.00	37.10	100.00	20.24	0.00	0.08	0.00	0.00	0.23	0.00								
2014 Central Non-MSA IL	9	11.69	7.06	22.22	19.41	33.33	60.25	33.33	13.28	11.11	0.31	0.00	0.88	0.11	0.42								
2014 Champaign-Urbana IL MSA	4	5.19	9.25	0.00	17.85	50.00	52.59	50.00	19.47	0.00	0.08	0.00	0.28	0.07	0.00								
2014 Coles County IL	2	2.60	0.00	0.00	28.21	50.00	65.10	50.00	6.69	0.00	0.27	0.00	0.65	0.19	0.00								
2014 Crawford County IL	1	1.30	0.00	0.00	0.00	0.00	89.10	100.00	10.90	0.00	0.00	0.00	0.00	0.00	0.00								
2014 Danville IL MSA	4	5.19	3.05	0.00	31.35	25.00	46.33	75.00	19.27	0.00	0.62	0.00	0.46	1.14	0.00								
2014 Davenport-Moline-Rock Island IL MSA	6	7.79	7.41	0.00	20.86	50.00	63.39	50.00	8.34	0.00	0.16	0.00	0.26	0.18	0.00								
2014 Decatur IL MSA	2	2.60	14.22	0.00	22.97	0.00	31.35	50.00	31.46	50.00	0.17	0.00	0.00	0.35	0.27								
2014 Kankakee IL MSA	5	6.49	9.07	0.00	15.69	0.00	57.07	80.00	18.17	20.00	0.10	0.00	0.00	0.00	0.49								
2014 Peoria IL MSA	9	11.69	7.23	0.00	14.65	0.00	54.56	77.78	23.57	22.22	0.15	0.00	0.00	0.19	0.16								
2014 Rockford IL MSA	5	6.49	7.55	0.00	21.15	40.00	43.64	40.00	27.12	20.00	0.12	0.00	0.31	0.07	0.10								

\* Based on 2014 Peer Small Business Data – US and PR

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

\*\*\* Source Data - Dun and Bradstreet (2014).

**Table 6. Geographic Distribution of Small Loans to Businesses**

Geographic Distribution: SMALL LOANS TO BUSINESSES		Geography: ILLINOIS						Evaluation Period: JANUARY 1, 2014 TO JUNE 30, 2015							
Assessment Area:	Total Small Business Loans		Low-Income Geographies		Moderate-Income Geographies		Middle-Income Geographies		Upper-Income Geographies		Market Share (%) by Geography				
	#	% of Total*	% of Businesses ***	% BANK Loans	% of Businesses ***	% BANK Loans	% of Businesses ***	% BANK Loans	% of Businesses ***	% BANK Loans	Overall	Low	Mod	Mid	Upp
<b>Limited Review:</b>															
2014 Southern Non-MSA IL	2	2.60	5.49	0.00	31.35	0.00	59.14	100.00	4.02	0.00	0.10	0.00	0.00	0.18	0.00
2014 Springfield IL MSA	11	14.29	10.65	18.18	20.25	27.27	35.48	45.45	29.81	9.09	0.43	0.43	0.74	0.64	0.13
2014 St Louis IL MSA	5	6.49	5.25	0.00	16.33	0.00	56.75	100.00	21.67	0.00	0.03	0.00	0.00	0.06	0.00

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\* Based on 2014 Small Business Data – US and PR

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

\*\*\* Source Data - Dun and Bradstreet (2014).

**Table 10. Borrower Distribution of Home Mortgage Refinance Loans**

Borrower Distribution: HOME MORTGAGE REFINANCE			Geography: ILLINOIS				Evaluation Period: JANUARY 1, 2014 TO JUNE 30, 2015					Market Share <sup>1</sup>				
Assessment Area:	Total Home Mortgage Refinance Loans		Low-Income Borrowers		Moderate-Income Borrowers		Middle-Income Borrowers		Upper-Income Borrowers		Overall	Low	Mod	Mid	Upp	
	#	% of Total <sup>2</sup>	% Families <sup>3</sup>	% BANK Loans <sup>4</sup>	% Families <sup>22</sup>	% BANK Loans <sup>4</sup>	% Families <sup>3</sup>	% BANK Loans <sup>4</sup>	% Families <sup>3</sup>	% BANK Loans <sup>4</sup>						
<b>Full Review:</b>																
2014 Northern Non-MSA IL	21	10.29	16.06	4.76	16.41	14.29	22.67	23.81	44.86	57.14	0.55	0.00	0.70	0.63	0.54	
<b>Limited Review:</b>																
2014 Bloomington IL MSA	21	10.29	18.38	14.29	16.60	42.86	23.80	19.05	41.21	23.81	0.66	0.47	1.56	0.50	0.34	
2014 Carbondale-Marion IL MSA	6	2.94	22.29	0.00	16.51	33.33	20.00	16.67	41.20	50.00	0.77	0.00	1.96	0.70	0.56	
2014 Central Non-MSA IL	6	2.94	20.93	33.33	19.54	16.67	21.89	33.33	37.64	16.67	0.21	0.89	0.49	0.00	0.00	
2014 Champaign-Urbana IL MSA	23	11.27	20.87	17.39	17.96	26.09	21.90	17.39	39.27	39.13	1.21	2.33	1.85	1.17	0.77	
2014 Coles County IL	3	1.47	20.29	66.67	20.44	33.33	19.61	0.00	39.66	0.00	1.69	12.50	0.00	0.00	0.00	
2014 Crawford County IL	0	0.00	20.13	0.00	19.02	0.00	22.95	0.00	37.90	0.00	0.00	0.00	0.00	0.00	0.00	
2014 Danville IL MSA	4	1.96	21.15	0.00	17.70	0.00	21.00	75.00	40.15	25.00	0.67	0.00	1.35	0.79	0.47	
2014 Davenport-Moline-Rock Island IL MSA	23	11.27	20.31	8.70	19.33	39.13	23.34	17.39	37.02	34.78	0.71	0.62	1.64	0.46	0.34	
2014 Decatur IL MSA	7	3.43	20.81	0.00	18.24	42.86	20.31	28.57	40.64	28.57	0.79	0.00	1.42	0.56	0.85	
2014 Kankakee IL MSA	9	4.41	20.69	11.11	18.78	11.11	20.21	33.33	40.32	44.44	0.53	1.92	0.79	0.56	0.25	
2014 Peoria IL MSA	26	12.75	19.68	11.54	18.33	19.23	22.42	34.62	39.57	34.62	0.80	0.69	0.66	0.96	0.79	
2014 Rockford IL MSA	12	5.88	22.55	8.33	18.05	25.00	21.56	41.67	37.84	25.00	0.34	0.59	0.29	0.61	0.13	

\* Based on 2014 Peer Mortgage Data – US and PR

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

\*\*\* Percentage of Families is based on the 2010 Census information.

\*\*\*\* As a percentage of loans with borrower income information available. No information was available for 0.0% of loans originated and purchased by bank.

22 Data shown includes only One to Four-family and manufactured housing. (Property type of 1 or 2)

**Table 10. Borrower Distribution of Home Mortgage Refinance Loans**

Borrower Distribution: HOME MORTGAGE REFINANCE				Geography: ILLINOIS				Evaluation Period: JANUARY 1, 2014 TO JUNE 30, 2015							
Assessment Area:	Total Home Mortgage Refinance Loans		Low-Income Borrowers		Moderate-Income Borrowers		Middle-Income Borrowers		Upper-Income Borrowers		Market Share <sup>1</sup>				
	#	% of Total <sup>2</sup>	% Families <sup>3</sup>	% BANK Loans <sup>4</sup>	% Families <sup>23</sup>	% BANK Loans <sup>4</sup>	% Families <sup>3</sup>	% BANK Loans <sup>4</sup>	% Families <sup>3</sup>	% BANK Loans <sup>4</sup>	Overall	Low	Mod	Mid	Upp
<b>Limited Review:</b>															
2014 Southern Non-MSA IL	11	5.39	25.11	0.00	21.17	27.27	21.70	18.18	32.02	54.55	1.74	0.00	1.08	2.52	1.85
2014 Springfield IL MSA	8	3.92	21.96	12.50	16.11	50.00	22.04	25.00	39.89	12.50	0.30	0.56	0.62	0.23	0.14
2014 St Louis IL MSA	24	11.76	23.13	25.00	17.68	41.67	22.28	20.83	36.91	12.50	0.44	1.13	0.79	0.29	0.14

\* Based on 2014 Peer Mortgage Data – US and PR

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

\*\*\* Percentage of Families is based on the 2010 Census information.

\*\*\*\* As a percentage of loans with borrower income information available. No information was available for 0.0% of loans originated and purchased by bank.

23 Data shown includes only One to Four-family and manufactured housing. (Property type of 1 or 2)



**Table 11. Borrower Distribution of Small Loans to Businesses**

Borrower Distribution: SMALL LOANS TO BUSINESSES		Geography: ILLINOIS			Evaluation Period: JANUARY 1, 2014 TO JUNE 30, 2015				
Assessment Area:	Total Small Loans to Businesses		Businesses With Revenues of \$1 million or less		Loans by Original Amount Regardless of Business Size			Market Share <sup>1</sup>	
	#	% of Total <sup>**</sup>	% of Businesses <sup>***</sup>	% BANK Loans <sup>****</sup>	\$100,000 or less	>\$100,000 to \$250,000	>\$250,000 to \$1,000,000	All	Rev\$ 1 Million or Less
<b>Full Review:</b>									
2014 Northern Non-MSA IL	10	12.99	71.31	100.00	100.00	0.00	0.00	0.23	0.54
<b>Limited Review:</b>									
2014 Bloomington IL MSA	1	1.30	69.48	100.00	100.00	0.00	0.00	0.00	0.00
2014 Carbondale-Marion IL MSA	1	1.30	69.29	100.00	100.00	0.00	0.00	0.08	0.23
2014 Central Non-MSA IL	9	11.69	68.61	88.89	100.00	0.00	0.00	0.31	0.55
2014 Champaign-Urbana IL MSA	4	5.19	68.00	100.00	100.00	0.00	0.00	0.08	0.18
2014 Coles County IL	2	2.60	70.37	100.00	100.00	0.00	0.00	0.27	0.71
2014 Crawford County IL	1	1.30	71.11	100.00	100.00	0.00	0.00	0.00	0.00
2014 Danville IL MSA	4	5.19	69.64	100.00	100.00	0.00	0.00	0.62	1.45
2014 Davenport-Moline-Rock Island IL MSA	6	7.79	70.60	83.33	100.00	0.00	0.00	0.16	0.43
2014 Decatur IL MSA	2	2.60	69.64	100.00	100.00	0.00	0.00	0.17	0.42
2014 Kankakee IL MSA	5	6.49	71.64	100.00	100.00	0.00	0.00	0.10	0.25
2014 Peoria IL MSA	9	11.69	69.14	100.00	100.00	0.00	0.00	0.15	0.34
2014 Rockford IL MSA	5	6.49	71.71	100.00	100.00	0.00	0.00	0.12	0.29

\* Based on 2014 Peer Small Business Data – US and PR

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

\*\*\* Businesses with revenues of \$1 million or less as a percentage of all businesses (Source D&B - 2014).

\*\*\*\* Small loans to businesses with revenues of \$1 million or less as a percentage of all loans reported as small loans to businesses. No information was available for 0.00% of small loans to businesses originated and purchased by the bank.

**Table 11. Borrower Distribution of Small Loans to Businesses**

Borrower Distribution: SMALL LOANS TO BUSINESSES			Geography: ILLINOIS		Evaluation Period: JANUARY 1, 2014 TO JUNE 30, 2015				
Assessment Area:	Total Small Loans to Businesses		Businesses With Revenues of \$1 million or less		Loans by Original Amount Regardless of Business Size			Market Share <sup>1</sup>	
	#	% of Total <sup>**</sup>	% of Businesses <sup>***</sup>	% BANK Loans <sup>****</sup>	\$100,000 or less	>\$100,000 to \$250,000	>\$250,000 to \$1,000,000	All	Rev\$ 1 Million or Less
<b>Limited Review:</b>									
2014 Southern Non-MSA IL	2	2.60	68.07	100.00	100.00	0.00	0.00	0.10	0.25
2014 Springfield IL MSA	11	14.29	68.95	100.00	100.00	0.00	0.00	0.43	1.03
2014 St Louis IL MSA	5	6.49	72.38	80.00	100.00	0.00	0.00	0.03	0.07

\* Based on 2014 Peer Small Business Data – US and PR

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

\*\*\* Businesses with revenues of \$1 million or less as a percentage of all businesses (Source D&B - 2014).

\*\*\*\* Small loans to businesses with revenues of \$1 million or less as a percentage of all loans reported as small loans to businesses. No information was available for 0.00% of small loans to businesses originated and purchased by the bank.

**Table 13. Geographic and Borrower Distribution of Consumer Loans**

Geographic and Borrower Distribution: CONSUMER LOANS																			Geography: ILLINOIS				Evaluation Period: JANUARY 1, 2014 TO JUNE 30, 2015			
Assessment Area:	Geographic Distribution										Borrower Distribution															
	Total Consumer Loans		Low-Income Geographies		Moderate-Income Geographies		Middle-Income Geographies		Upper-Income Geographies		Low-Income Borrowers		Moderate-Income Borrowers		Middle-Income Borrowers		Upper-Income Borrowers									
	#	% of Total	% of Hhlds**	% of BANK Loans	% of Hhlds**	% of BANK Loans	% of Hhlds**	% of BANK Loans	% of Hhlds**	% of BANK Loans	% of Hhlds**	% of BANK Loans	% of Hhlds**	% of BANK Loans	% of Hhlds**	% of BANK Loans	% of Hhlds**	% of BANK Loans								
<b>Full Review:</b>																										
2014 Northern Non-MSA IL	124	11.72	0.57	4.03	6.95	20.16	67.21	55.65	25.28	20.16	19.62	51.61	14.87	25.00	18.05	15.32	47.46	8.06								
<b>Limited Review:</b>																										
2014 Bloomington IL MSA	38	3.59	1.97	5.26	14.20	26.32	60.44	52.63	23.05	15.79	23.68	76.32	15.75	23.68	17.66	0.00	42.91	0.00								
2014 Carbondale-Marion IL MSA	36	3.40	3.24	0.00	26.55	19.44	47.50	55.56	22.71	25.00	27.61	47.22	13.57	27.78	16.59	13.89	42.23	11.11								
2014 Central Non-MSA IL	135	12.76	4.35	8.89	17.68	28.89	63.86	48.15	14.11	14.07	26.29	63.70	17.05	18.52	17.85	11.11	38.81	6.67								
2014 Champaign-Urbana IL MSA	91	8.60	9.46	12.09	16.38	27.47	55.63	57.14	16.60	3.30	26.18	70.33	15.24	21.98	15.99	4.40	42.59	3.30								
2014 Coles County IL	22	2.08	0.00	0.00	18.87	40.91	72.80	59.09	8.33	0.00	30.73	72.73	17.13	9.09	16.99	9.09	35.15	9.09								
2014 Crawford County IL	32	3.02	0.00	0.00	0.00	0.00	85.66	87.50	14.34	12.50	22.77	62.50	16.18	31.25	22.82	3.13	38.24	3.13								
2014 Danville IL MSA	36	3.40	4.17	5.56	27.80	44.44	47.74	25.00	20.29	25.00	24.08	50.00	16.08	27.78	18.17	13.89	41.66	8.33								
2014 Davenport-Moline-Rock Island IL	50	4.73	2.69	0.00	21.09	44.00	66.92	54.00	9.29	2.00	23.85	68.00	17.36	20.00	18.60	8.00	40.20	4.00								
2014 Decatur IL MSA	19	1.80	8.31	31.58	24.76	36.84	34.48	26.32	32.46	5.26	23.24	57.89	17.21	26.32	17.69	5.26	41.86	10.53								
2014 Kankakee IL MSA	48	4.54	7.30	10.42	16.80	27.08	57.50	45.83	18.40	16.67	24.29	79.17	16.71	16.67	17.65	4.17	41.35	0.00								
2014 Peoria IL MSA	151	14.27	5.06	6.62	16.16	26.49	57.81	54.30	20.96	12.58	23.34	66.89	16.39	20.53	18.67	8.61	41.60	3.97								
2014 Rockford IL MSA	34	3.21	8.79	8.82	25.42	41.18	41.78	29.41	24.00	20.59	25.62	58.82	16.44	23.53	17.65	14.71	40.29	2.94								

\* Consumer Loans originated and purchased in the MA/AA as a percentage of all consumer loans originated and purchased in the rated area.

\*\* Percentage of households is based on 2010 Census Information.

**Table 13. Geographic and Borrower Distribution of Consumer Loans**

Geographic and Borrower Distribution: CONSUMER LOANS																			Geography: ILLINOIS				Evaluation Period: JANUARY 1, 2014 TO JUNE 30, 2015			
Assessment Area:	Geographic Distribution										Borrower Distribution															
	Total Consumer Loans		Low-Income Geographies		Moderate-Income Geographies		Middle-Income Geographies		Upper-Income Geographies		Low-Income Borrowers		Moderate-Income Borrowers		Middle-Income Borrowers		Upper-Income Borrowers									
	#	% of Total	% of Hhlds**	% of BANK Loans	% of Hhlds**	% of BANK Loans	% of Hhlds**	% of BANK Loans	% of Hhlds**	% of BANK Loans	% of Hhlds**	% of BANK Loans	% of Hhlds**	% of BANK Loans	% of Hhlds**	% of BANK Loans	% of Hhlds**	% of BANK Loans								
<b>Limited Review:</b>																										
2014 Southern Non-MSA IL	54	5.10	1.28	0.00	39.49	48.15	56.07	51.85	3.16	0.00	28.86	72.22	18.51	16.67	18.32	7.41	34.30	3.70								
2014 Springfield IL MSA	85	8.03	9.83	35.29	19.31	24.71	42.12	36.47	28.10	3.53	23.91	77.65	16.37	14.12	18.06	3.53	41.66	4.71								
2014 St Louis IL MSA	103	9.74	7.32	11.65	17.89	25.24	55.82	54.37	18.96	8.74	25.93	61.17	16.23	25.24	18.48	9.71	39.35	3.88								

\* Consumer Loans originated and purchased in the MA/AA as a percentage of all consumer loans originated and purchased in the rated area.  
 \*\* Percentage of households is based on 2010 Census Information.

**Table 14. Qualified Investments**

QUALIFIED INVESTMENTS		Geography: ILLINOIS				Evaluation Period: JUNE 24, 2012 TO JULY 13, 2015			
Assessment Area:	Prior Period Investments <sup>*</sup>		Current Period Investments		Total Investments			Unfunded Commitments <sup>**</sup>	
	#	\$(000's)	#	\$(000's)	#	\$(000's)	% of Total	#	\$(000's)
<b>Full Review:</b>									
2014 Northern Non-MSA IL	0	0	1	79	1	79	4.18	0	0
<b>Limited Review:</b>									
2014 Bloomington IL MSA	0	0	1	114	1	114	6.03	0	0
2014 Carbondale-Marion IL MSA	0	0	1	62	1	62	3.28	0	0
2014 Central Non-MSA IL	0	0	2	41	2	41	2.17	0	0
2014 Champaign-Urbana IL MSA	0	0	1	122	1	122	6.46	0	0
2014 Coles County IL	0	0	2	104	2	104	5.51	0	0
2014 Crawford County IL	0	0	2	59	2	59	3.12	0	0
2014 Danville IL MSA	0	0	1	40	1	40	2.12	0	0
2014 Davenport-Moline-Rock Island IL MSA	0	0	3	214	3	214	11.33	0	0
2014 Decatur IL MSA	0	0	3	182	3	182	9.63	0	0
2014 Kankakee IL MSA	0	0	2	244	2	244	12.92	0	0
2014 Peoria IL MSA	0	0	1	123	1	123	6.51	0	0
2014 Rockford IL MSA	0	0	1	52	1	52	2.75	0	0
2014 Southern Non-MSA IL	0	0	2	100	2	100	5.29	0	0
2014 Springfield IL MSA	0	0	1	163	1	163	8.64	0	0
2014 St Louis IL MSA	0	0	2	190	2	190	10.06	0	0

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

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

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

DISTRIBUTION OF BRANCH DELIVERY SYSTEM AND BRANCH OPENINGS/CLOSINGS																	Geography: ILLINOIS				Evaluation Period: JANUARY 1, 2014 TO JUNE 30, 2015			
MA/Assessment Area:	Deposits	Branches						Branch Openings/Closings						Population										
	% of Rated Area Deposits in AA	# of BANK Branches	% of Rated Area Branches in AA	Location of Branches by Income of Geographies (%)				# of Branch Openings	# of Branch Closings	Net change in Location of Branches (+ or -)				% of Population within Each Geography										
				Low	Mod	Mid	Upp			Low	Mod	Mid	Upp	Low	Mod	Mid	Upp							
<b>Full Review:</b>																								
2014 Northern Non-MSA	11.67	5	13.89	0.00	0.00	60.00	40.00	0	0	0	0	0	0	0.55	6.51	66.59	26.36							
<b>Limited Review:</b>																								
2014 Bloomington IL MSA	4.42	2	5.56	0.00	0.00	50.00	50.00	0	0	0	0	0	0	1.52	13.01	56.79	24.53							
2014 Carbondale-Marion IL MSA	6.11	2	5.56	0.00	50.00	0.00	50.00	0	0	0	0	0	0	5.55	24.02	49.06	21.37							
2014 Central Non-MSA IL	10.19	3	8.33	0.00	0.00	100.00	0.00	0	0	0	0	0	0	5.87	17.69	63.93	12.51							
2014 Champaign-Urbana IL MSA	8.22	3	8.33	0.00	0.00	100.00	0.00	0	1	0	0	-1	0	10.15	15.67	53.13	17.26							
2014 Coles County IL	2.71	1	2.78	0.00	0.00	100.00	0.00	0	0	0	0	0	0	0.00	16.91	75.19	7.90							
2014 Crawford County IL	3.14	1	2.78	0.00	0.00	100.00	0.00	0	0	0	0	0	0	0.00	0.00	85.51	14.49							
2014 Danville IL MSA	3.21	1	2.78	0.00	0.00	0.00	100.00	0	0	0	0	0	0	4.35	28.26	48.27	19.12							
2014 Davenport-Moline-Rock Island IL MSA	4.43	2	5.56	0.00	50.00	50.00	0.00	0	0	0	0	0	0	3.05	21.01	66.25	9.68							
2014 Decatur IL MSA	1.38	1	2.78	0.00	0.00	0.00	100.00	0	0	0	0	0	0	9.23	23.98	33.53	33.26							
2014 Kankakee IL MSA	8.15	2	5.56	0.00	50.00	50.00	0.00	0	0	0	0	0	0	7.95	18.05	54.60	19.41							
2014 Peoria IL MSA	11.57	4	11.11	0.00	0.00	25.00	75.00	0	0	0	0	0	0	5.17	15.33	56.87	22.63							
2014 Rockford IL MSA	4.02	1	2.78	0.00	0.00	100.00	0.00	0	0	0	0	0	0	9.74	24.57	41.95	23.74							
2014 Southern Non-MSA	7.74	2	5.56	0.00	0.00	100.00	0.00	0	0	0	0	0	0	1.40	38.47	57.20	2.93							
2014 Springfield IL MSA	5.83	2	5.56	0.00	50.00	50.00	0.00	0	0	0	0	0	0	10.70	17.51	41.32	29.99							
2014 St Louis IL MSA	7.26	4	11.11	0.00	0.00	100.00	0.00	0	0	0	0	0	0	7.21	17.22	55.03	20.55							

## Indiana

Table 1. Lending Volume

LENDING VOLUME		Geography: INDIANA				Evaluation Period: JANUARY 1, 2014 TO JUNE 30, 2015						
Assessment Area (2014):	% of Rated Area Loans (#) in MA/AA*	Home Mortgage		Small Loans to Businesses		Small Loans to Farms		Community Development Loans**		Total Reported Loans		% of Rated Area Deposits in MA/AA***
		#	\$ (000's)	#	\$ (000's)	#	\$ (000's)	#	\$ (000's)	#	\$(000's)	
<b>Full Review:</b>												
2014 Southern Non-MSA IN	7.18	22	2,264	8	24	0	0	1	100	31	2,388	16.95
<b>Limited Review:</b>												
2014 Bloomington IN MSA	6.48	27	3,319	0	0	0	0	1	5	28	3,324	3.14
2014 Clinton County IN	0.24	1	76	0	0	0	0	0	0	1	76	1.99
2014 Columbus IN MSA	5.09	19	2,268	2	110	0	0	1	10	22	2,388	5.29
2014 Elkhart-Goshen IN MSA	7.87	25	2,748	8	13	0	0	1	5	34	2,766	4.07
2014 Evansville IN MSA	8.80	32	3,460	5	319	0	0	1	10	38	3,789	11.34
2014 Fort Wayne IN MSA	9.26	25	2,406	14	97	0	0	1	10	40	2,513	6.68
2014 Henry County IN	2.55	7	697	4	6	0	0	0	0	11	703	1.64
2014 Indianapolis-Carmel-Anderson IN	12.96	36	3,219	18	335	0	0	2	170	56	3,724	25.11
2014 Lafayette-West Lafayette IN MSA	8.33	35	3,900	1	2	0	0	0	0	36	3,902	0.95
2014 Michigan City-La Porte IN MSA	8.10	24	2,349	10	45	0	0	1	10	35	2,404	4.93
2014 Muncie IN MSA	2.08	8	539	1	1	0	0	0	0	9	540	1.76
2014 Northern Non-MSA IN	9.72	27	2,940	14	36	0	0	1	10	42	2,986	6.67
2014 South Bend-Mishawaka IN MSA	9.95	31	3,499	11	47	0	0	1	5	43	3,551	3.82
2014 Terre Haute IN MSA	1.39	3	205	2	3	0	0	1	10	6	218	5.66

\* Loan Data as of June 30, 2015. Rated area refers to either state or multistate MA rating area.

\*\* The evaluation period for Community Development Loans is from January 01, 2014 to July 13, 2015.

\*\*\* Deposit Data as of June 30, 2014. Rated Area refers to either the state, multistate MA, or institution, as appropriate.

Table 1. Other Products

LENDING VOLUME		Geography: INDIANA						Evaluation Period: JANUARY 1, 2014 TO JUNE 30, 2015						
Assessment Area (2014):	% of Rated Area Loans (#) in MA/AA*	Total Optional Loans**		Small Business Real Estate Secured**		Home Equity**		Motor Vehicle**		Credit Card**		Other Secured Consumer**		% of Rated Area Deposits in AA***
		#	\$ (000's)	#	\$ (000's)	#	\$ (000's)	#	\$ (000's)	#	\$ (000's)	#	\$ (000's)	
<b>Full Review:</b>														
2014 Southern Non-MSA IN	16.84	223	276	0	0	0	0	0	0	0	0	0	0	16.95
<b>Limited Review:</b>														
2014 Bloomington IN MSA	0.60	8	11	0	0	0	0	0	0	0	0	0	0	3.14
2014 Clinton County IN	1.74	23	25	0	0	0	0	0	0	0	0	0	0	1.99
2014 Columbus IN MSA	4.68	62	73	0	0	0	0	0	0	0	0	0	0	5.29
2014 Elkhart-Goshen IN	5.06	67	82	0	0	0	0	0	0	0	0	0	0	4.07
2014 Evansville IN MSA	8.08	107	140	0	0	0	0	0	0	0	0	0	0	11.34
2014 Fort Wayne IN MSA	7.85	104	131	0	0	0	0	0	0	0	0	0	0	6.68
2014 Henry County IN	2.64	35	51	0	0	0	0	0	0	0	0	0	0	1.64
2014 Indianapolis-Carmel-Anderson IN MSA	20.69	274	346	0	0	0	0	0	0	0	0	0	0	25.11
2014 Lafayette-West Lafayette IN MSA	1.28	17	24	0	0	0	0	0	0	0	0	0	0	0.95
2014 Michigan City-La Porte IN MSA	5.74	76	95	0	0	0	0	0	0	0	0	0	0	4.93
2014 Muncie IN MSA	1.74	23	26	0	0	0	0	0	0	0	0	0	0	1.76
2014 Northern Non-MSA IN	12.31	163	225	0	0	0	0	0	0	0	0	0	0	6.67
2014 South Bend-Mishawaka IN MSA	8.46	112	141	0	0	0	0	0	0	0	0	0	0	3.82
2014 Terre Haute IN MSA	2.27	30	42	0	0	0	0	0	0	0	0	0	0	5.66

\* Loan Data as of June 30, 2015. Rated area refers to either state or multistate MA rating area.

\*\* The evaluation period for Optional Product Line(s) is from January 01, 2014 to June 30, 2015.

\*\*\* Deposit Data as of June 30, 2014. Rated Area refers to either the state, multistate MA, or institution, as appropriate.



**Table 1. Other Products**

LENDING VOLUME		Geography: INDIANA		Evaluation Period: JANUARY 1, 2014 TO JUNE 30, 2015	
Assessment Area (2014):	Other Unsecured Consumer Loans*		Other Optional Loans*		
	#	\$ (000's)	#	\$ (000's)	
<b>Full Review:</b>					
2014 Southern Non-MSA IN	223	276	0	0	
<b>Limited Review:</b>					
2014 Bloomington IN MSA	8	11	0	0	
2014 Clinton County IN	23	25	0	0	
2014 Columbus IN MSA	62	73	0	0	
2014 Elkhart-Goshen IN MSA	67	82	0	0	
2014 Evansville IN MSA	107	140	0	0	
2014 Fort Wayne IN MSA	104	131	0	0	
2014 Henry County IN	35	51	0	0	
2014 Indianapolis-Carmel-Anderson IN MSA	274	346	0	0	
2014 Lafayette-West Lafayette IN MSA	17	24	0	0	
2014 Michigan City-La Porte IN MSA	76	95	0	0	
2014 Muncie IN MSA	23	26	0	0	
2014 Northern Non-MSA IN	163	225	0	0	
2014 South Bend-Mishawaka IN MSA	112	141	0	0	
2014 Terre Haute IN MSA	30	42	0	0	

\* The evaluation period for Optional Product Line(s) is from January 01, 2014 to June 30, 2015.

**Table 4. Geographic Distribution of Home Mortgage Refinance Loans**

Geographic Distribution: HOME MORTGAGE REFINANCE			Geography: INDIANA						Evaluation Period: JANUARY 1, 2014 TO JUNE 30, 2015						
Assessment Area:	Total Home Mortgage Refinance Loans		Low-Income Geographies		Moderate-Income Geographies		Middle-Income Geographies		Upper-Income Geographies		Market Share (%) by Geography'				
	#	% of Total**	% Owner Occ Units***	% BANK Loans****	% Owner Occ Units***	% BANK Loans	% Owner Occ Units***	% BANK Loans	% Owner Occ Units***	% BANK Loans	Overall	Low	Mod	Mid	Upp
<b>Full Review:</b>															
2014 Southern Non-MSA IN	21	6.84	0.00	0.00	9.08	9.52	66.87	66.67	24.06	23.81	0.80	0.00	1.34	0.76	0.70
<b>Limited Review:</b>															
2014 Bloomington IN MSA	26	8.47	2.46	0.00	11.88	15.38	51.77	69.23	33.89	15.38	0.69	0.00	0.00	1.20	0.00
2014 Clinton County IN	1	0.33	0.00	0.00	5.68	0.00	60.19	100.00	34.13	0.00	0.41	0.00	0.00	0.78	0.00
2014 Columbus IN MSA	18	5.86	0.00	0.00	9.60	16.67	71.07	77.78	19.33	5.56	1.07	0.00	2.08	1.15	0.55
2014 Elkhart-Goshen IN MSA	24	7.82	0.00	0.00	13.11	16.67	55.62	41.67	31.27	41.67	0.37	0.00	0.58	0.24	0.50
2014 Evansville IN MSA	31	10.10	3.34	0.00	18.09	6.45	37.96	48.39	40.61	45.16	1.01	0.00	0.25	1.17	1.19
2014 Fort Wayne IN MSA	24	7.82	4.59	0.00	19.89	25.00	43.98	41.67	31.53	33.33	0.66	0.00	1.00	0.62	0.59
2014 Henry County IN	7	2.28	0.00	0.00	15.50	14.29	64.97	85.71	19.53	0.00	1.39	0.00	3.70	1.62	0.00
2014 Indianapolis-Carmel-Anderson IN MSA	33	10.75	4.99	21.21	18.64	30.30	42.47	36.36	33.89	12.12	0.15	0.90	0.38	0.14	0.05
2014 Lafayette-West Lafayette IN MSA	33	10.75	0.88	3.03	23.59	24.24	51.10	54.55	24.43	18.18	1.20	0.00	1.77	1.19	0.84
2014 Michigan City-La Porte IN MSA	24	7.82	0.00	0.00	20.33	0.00	59.64	91.67	20.03	8.33	1.05	0.00	0.00	1.54	0.42
2014 Muncie IN MSA	6	1.95	1.33	0.00	27.03	50.00	38.21	16.67	33.43	33.33	0.50	0.00	1.59	0.29	0.30
2014 Northern Non-MSA IN	26	8.47	0.00	0.00	5.49	7.69	73.63	76.92	20.88	15.38	0.70	0.00	1.57	0.76	0.34

\* Based on 2014 Peer Mortgage Data – US and PR

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

\*\*\* Percentage of Owner Occupied Units is the number of owner occupied units in a particular geography divided by the number of owner occupied housing units in the area based on 2010 Census information.

\*\*\*\* Data shown includes only One to Four-family and manufactured housing. (Property type of 1 or 2)

**Table 4. Geographic Distribution of Home Mortgage Refinance Loans**

Geographic Distribution: HOME MORTGAGE REFINANCE			Geography: INDIANA				Evaluation Period: JANUARY 1, 2014 TO JUNE 30, 2015					Market Share (%) by Geography				
Assessment Area:	Total Home Mortgage Refinance Loans		Low-Income Geographies		Moderate-Income Geographies		Middle-Income Geographies		Upper-Income Geographies							
	#	% of Total**	% Owner Occ Units***	% BANK Loans****	% Owner Occ Units***	% BANK Loans	% Owner Occ Units***	% BANK Loans	% Owner Occ Units***	% BANK Loans	Overall	Low	Mod	Mid	Upp	
<b>Limited Review:</b>																
2014 South Bend-Mishawaka IN MSA	30	9.77	2.22	3.33	21.95	16.67	37.41	43.33	38.43	36.67	0.88	7.69	0.72	1.09	0.68	
2014 Terre Haute IN MSA	3	0.98	5.28	0.00	10.70	0.00	57.21	66.67	26.81	33.33	0.36	0.00	0.00	0.43	0.38	

\* Based on 2014 Peer Mortgage Data – US and PR

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

\*\*\* Percentage of Owner Occupied Units is the number of owner occupied units in a particular geography divided by the number of owner occupied housing units in the area based on 2010 Census information.

\*\*\*\* Data shown includes only One to Four-family and manufactured housing. (Property type of 1 or 2)

**Table 6. Geographic Distribution of Small Loans to Businesses**

Geographic Distribution: SMALL LOANS TO BUSINESSES			Geography: INDIANA				Evaluation Period: JANUARY 1, 2014 TO JUNE 30, 2015					Market Share (%) by Geography				
Assessment Area:	Total Small Business Loans		Low-Income Geographies		Moderate-Income Geographies		Middle-Income Geographies		Upper-Income Geographies		Overall	Low	Mod	Mid	Upp	
	#	% of Total**	% of Businesses***	% BANK Loans	% of Businesses***	% BANK Loans	% of Businesses***	% BANK Loans	% of Businesses***	% BANK Loans						
<b>Full Review:</b>																
2014 Southern Non-MSA IN	8	8.16	0.00	0.00	13.39	50.00	61.56	37.50	25.05	12.50	0.18	0.00	0.60	0.15	0.12	
<b>Limited Review:</b>																
2014 Bloomington IN MSA	0	0.00	7.42	0.00	12.55	0.00	51.50	0.00	28.53	0.00	0.00	0.00	0.00	0.00	0.00	
2014 Clinton County IN	0	0.00	0.00	0.00	14.45	0.00	52.82	0.00	32.73	0.00	0.00	0.00	0.00	0.00	0.00	
2014 Columbus IN MSA	2	2.04	0.00	0.00	24.98	0.00	57.27	100.00	17.75	0.00	0.11	0.00	0.00	0.18	0.00	
2014 Elkhart-Goshen IN MSA	8	8.16	0.00	0.00	17.01	12.50	55.28	50.00	27.71	37.50	0.22	0.00	0.26	0.20	0.26	
2014 Evansville IN MSA	5	5.10	5.08	0.00	23.68	60.00	37.35	0.00	33.88	40.00	0.12	0.00	0.24	0.00	0.17	
2014 Fort Wayne IN MSA	14	14.29	8.89	7.14	23.80	57.14	38.22	14.29	28.76	21.43	0.15	0.18	0.43	0.08	0.05	
2014 Henry County IN	4	4.08	0.00	0.00	14.29	25.00	62.76	75.00	22.95	0.00	0.27	0.00	0.00	0.43	0.00	
2014 Indianapolis-Carmel-Anderson IN MSA	18	18.37	5.26	16.67	19.58	38.89	40.70	16.67	34.46	27.78	0.04	0.24	0.09	0.02	0.02	
2014 Lafayette-West Lafayette IN MSA	1	1.02	5.80	0.00	40.13	100.00	35.06	0.00	18.41	0.00	0.00	0.00	0.00	0.00	0.00	
2014 Michigan City-La Porte IN MSA	10	10.20	0.00	0.00	28.25	20.00	56.03	60.00	15.72	20.00	0.55	0.00	0.30	0.72	0.53	
2014 Muncie IN MSA	1	1.02	2.73	0.00	31.26	100.00	39.40	0.00	24.93	0.00	0.09	0.00	0.29	0.00	0.00	
2014 Northern Non-MSA IN	14	14.29	0.00	0.00	10.81	7.14	69.38	50.00	19.81	42.86	0.22	0.00	0.29	0.17	0.41	

\* Based on 2014 Peer Small Business Data – US and PR

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

\*\*\* Source Data - Dun and Bradstreet (2014).

**Table 6. Geographic Distribution of Small Loans to Businesses**

Geographic Distribution: SMALL LOANS TO BUSINESSES			Geography: INDIANA				Evaluation Period: JANUARY 1, 2014 TO JUNE 30, 2015					Market Share (%) by Geography'				
Assessment Area:	Total Small Business Loans		Low-Income Geographies		Moderate-Income Geographies		Middle-Income Geographies		Upper-Income Geographies		Overall	Low	Mod	Mid	Upp	
	#	% of Total"	% of Businesses***	% BANK Loans	% of Businesses ***	% BANK Loans	% of Businesses ***	% BANK Loans	% of Businesses ***	% BANK Loans						
<b>Limited Review:</b>																
2014 South Bend-Mishawaka IN MSA	11	11.22	7.82	0.00	24.33	36.36	34.58	9.09	33.26	54.55	0.13	0.00	0.22	0.08	0.16	
2014 Terre Haute IN MSA	2	2.04	15.70	0.00	9.57	50.00	52.37	50.00	22.37	0.00	0.13	0.00	0.63	0.14	0.00	

\* Based on 2014 Peer Small Business Data – US and PR

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

\*\*\* Source Data - Dun and Bradstreet (2014).

**Table 10. Borrower Distribution of Home Mortgage Refinance Loans**

Borrower Distribution: HOME MORTGAGE REFINANCE			Geography: INDIANA						Evaluation Period: JANUARY 1, 2014 TO JUNE 30, 2015						
Assessment Area:	Total Home Mortgage Refinance Loans		Low-Income Borrowers		Moderate-Income Borrowers		Middle-Income Borrowers		Upper-Income Borrowers		Market Share <sup>1</sup>				
	#	% of Total <sup>2</sup>	% Families <sup>3</sup>	% BANK Loans <sup>4</sup>	% Families <sup>24</sup>	% BANK Loans <sup>4</sup>	% Families <sup>3</sup>	% BANK Loans <sup>4</sup>	% Families <sup>3</sup>	% BANK Loans <sup>4</sup>	Overall	Low	Mod	Mid	Upp
<b>Full Review:</b>															
2014 Southern Non-MSA IN	21	6.84	17.22	4.76	18.93	28.57	22.66	33.33	41.19	33.33	1.04	0.75	0.43	1.65	0.97
<b>Limited Review:</b>															
2014 Bloomington IN MSA	26	8.47	20.69	15.38	16.51	30.77	20.36	19.23	42.44	34.62	0.88	2.04	0.69	1.08	0.54
2014 Clinton County IN	1	0.33	14.30	0.00	18.91	0.00	23.78	100.00	43.01	0.00	0.51	0.00	2.08	0.00	0.00
2014 Columbus IN MSA	18	5.86	18.65	16.67	19.27	38.89	23.45	22.22	38.63	22.22	1.27	2.53	3.40	0.67	0.00
2014 Elkhart-Goshen IN MSA	24	7.82	17.81	12.50	19.19	16.67	22.78	37.50	40.22	33.33	0.45	1.61	0.33	0.55	0.18
2014 Evansville IN MSA	31	10.10	20.50	22.58	16.93	16.13	22.02	29.03	40.55	32.26	1.26	2.11	1.11	1.44	0.95
2014 Fort Wayne IN MSA	24	7.82	19.07	25.00	18.63	25.00	23.22	33.33	39.08	16.67	0.83	1.76	0.85	1.00	0.38
2014 Henry County IN	7	2.28	19.75	28.57	19.18	14.29	21.52	14.29	39.55	42.86	1.66	6.25	0.00	0.00	2.44
2014 Indianapolis-Carmel-Anderson IN MSA	33	10.75	21.09	27.27	17.38	42.42	20.79	15.15	40.74	15.15	0.20	0.61	0.36	0.13	0.05
2014 Lafayette-West Lafayette IN MSA	33	10.75	21.86	12.12	17.19	24.24	21.12	18.18	39.82	45.45	1.55	2.68	2.53	0.37	1.45
2014 Michigan City-La Porte IN MSA	24	7.82	20.48	8.33	18.87	37.50	21.43	33.33	39.22	20.83	1.26	0.69	2.78	0.88	0.69
2014 Muncie IN MSA	6	1.95	20.23	33.33	19.01	0.00	21.73	50.00	39.03	16.67	0.61	1.92	0.00	1.27	0.31
2014 Northern Non-MSA IN	26	8.47	16.03	7.69	19.27	34.62	24.00	11.54	40.70	46.15	0.82	1.01	1.16	0.86	0.57

\* Based on 2014 Peer Mortgage Data – US and PR

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

\*\*\* Percentage of Families is based on the 2010 Census information.

\*\*\*\* As a percentage of loans with borrower income information available. No information was available for 0.0% of loans originated and purchased by bank.

24 Data shown includes only One to Four-family and manufactured housing. (Property type of 1 or 2)

**Table 10. Borrower Distribution of Home Mortgage Refinance Loans**

Borrower Distribution: HOME MORTGAGE REFINANCE		Geography: INDIANA					Evaluation Period: JANUARY 1, 2014 TO JUNE 30, 2015									
Assessment Area:	Total Home Mortgage Refinance Loans		Low-Income Borrowers		Moderate-Income Borrowers		Middle-Income Borrowers		Upper-Income Borrowers		Market Share <sup>6</sup>					
	#	% of Total <sup>7</sup>	% Families <sup>***</sup>	% BANK Loans <sup>****</sup>	% Families <sup>25</sup>	% BANK Loans <sup>****</sup>	% Families <sup>***</sup>	% BANK Loans <sup>****</sup>	% Families <sup>***</sup>	% BANK Loans <sup>****</sup>	Overall	Low	Mod	Mid	Upp	
<b>Limited Review:</b>																
2014 South Bend-Mishawaka IN MSA	30	9.77	20.35	6.67	18.06	33.33	20.94	26.67	40.65	33.33	1.08	0.78	2.04	1.23	0.61	
2014 Terre Haute IN MSA	3	0.98	20.48	0.00	18.53	0.00	20.12	0.00	40.86	100.00	0.43	0.00	0.00	0.00	1.16	

\* Based on 2014 Peer Mortgage Data – US and PR

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

\*\*\* Percentage of Families is based on the 2010 Census information.

\*\*\*\* As a percentage of loans with borrower income information available. No information was available for 0.0% of loans originated and purchased by bank.

25 Data shown includes only One to Four-family and manufactured housing. (Property type of 1 or 2)

**Table 11. Borrower Distribution of Small Loans to Businesses**

Borrower Distribution: SMALL LOANS TO BUSINESSES			Geography: INDIANA		Evaluation Period: JANUARY 1, 2014 TO JUNE 30, 2015				
Assessment Area:	Total Small Loans to Businesses		Businesses With Revenues of \$1 million or less		Loans by Original Amount Regardless of Business Size			Market Share <sup>1</sup>	
	#	% of Total <sup>2</sup>	% of Businesses <sup>3</sup>	% BANK Loans <sup>4</sup>	\$100,000 or less	>\$100,000 to \$250,000	>\$250,000 to \$1,000,000	All	Rev\$ 1 Million or Less
<b>Full Review:</b>									
2014 Southern Non-MSA IN	8	8.16	69.96	100.00	100.00	0.00	0.00	0.18	0.45
<b>Limited Review:</b>									
2014 Bloomington IN MSA	0	0.00	71.08	0.00	0.00	0.00	0.00	0.00	0.00
2014 Clinton County IN	0	0.00	71.44	0.00	0.00	0.00	0.00	0.00	0.00
2014 Columbus IN MSA	2	2.04	68.37	50.00	50.00	50.00	0.00	0.11	0.00
2014 Elkhart-Goshen IN MSA	8	8.16	69.36	100.00	100.00	0.00	0.00	0.22	0.59
2014 Evansville IN MSA	5	5.10	69.71	80.00	80.00	20.00	0.00	0.12	0.25
2014 Fort Wayne IN MSA	14	14.29	69.77	100.00	100.00	0.00	0.00	0.15	0.36
2014 Henry County IN	4	4.08	70.60	100.00	100.00	0.00	0.00	0.27	0.54
2014 Indianapolis-Carmel-Anderson IN MSA	18	18.37	70.17	88.89	88.89	11.11	0.00	0.04	0.08
2014 Lafayette-West Lafayette IN MSA	1	1.02	68.45	100.00	100.00	0.00	0.00	0.00	0.00
2014 Michigan City-La Porte IN MSA	10	10.20	70.16	100.00	100.00	0.00	0.00	0.55	1.44
2014 Muncie IN MSA	1	1.02	69.77	100.00	100.00	0.00	0.00	0.09	0.17
2014 Northern Non-MSA IN	14	14.29	71.29	92.86	100.00	0.00	0.00	0.22	0.46

\* Based on 2014 Peer Small Business Data – US and PR

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

\*\*\* Businesses with revenues of \$1 million or less as a percentage of all businesses (Source D&B - 2014).

\*\*\*\* Small loans to businesses with revenues of \$1 million or less as a percentage of all loans reported as small loans to businesses. No information was available for 3.06% of small loans to businesses originated and purchased by the bank.



**Table 11. Borrower Distribution of Small Loans to Businesses**

Borrower Distribution: SMALL LOANS TO BUSINESSES				Geography: INDIANA		Evaluation Period: JANUARY 1, 2014 TO JUNE 30, 2015			
Assessment Area:	Total Small Loans to Businesses		Businesses With Revenues of \$1 million or less		Loans by Original Amount Regardless of Business Size			Market Share <sup>1</sup>	
	#	% of Total <sup>**</sup>	% of Businesses <sup>***</sup>	% BANK Loans <sup>****</sup>	\$100,000 or less	>\$100,000 to \$250,000	>\$250,000 to \$1,000,000	All	Rev\$ 1 Million or Less
<b>Limited Review:</b>									
2014 South Bend-Mishawaka IN MSA	11	11.22	69.50	90.91	100.00	0.00	0.00	0.13	0.29
2014 Terre Haute IN MSA	2	2.04	68.80	100.00	100.00	0.00	0.00	0.13	0.33

\* Based on 2014 Peer Small Business Data – US and PR

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

\*\*\* Businesses with revenues of \$1 million or less as a percentage of all businesses (Source D&B - 2014).

\*\*\*\* Small loans to businesses with revenues of \$1 million or less as a percentage of all loans reported as small loans to businesses. No information was available for 3.06% of small loans to businesses originated and purchased by the bank.

**Table 13. Geographic and Borrower Distribution of Consumer Loans**

Geographic and Borrower Distribution: CONSUMER LOANS										Geography: INDIANA				Evaluation Period: JANUARY 1, 2014 TO JUNE 30, 2015					
Assessment Area:	Geographic Distribution										Borrower Distribution								
	Total Consumer Loans		Low-Income Geographies		Moderate-Income Geographies		Middle-Income Geographies		Upper-Income Geographies		Low-Income Borrowers		Moderate-Income Borrowers		Middle-Income Borrowers		Upper-Income Borrowers		
	#	% of Total*	% of Hhlds**	% of BANK Loans	% of Hhlds**	% of BANK Loans	% of Hhlds**	% of BANK Loans	% of Hhlds**	% of BANK Loans	% of Hhlds**	% of BANK Loans	% of Hhlds**	% of BANK Loans	% of Hhlds**	% of BANK Loans	% of Hhlds**	% of BANK Loans	
<b>Full Review:</b>																			
2014 Southern Non-MSA	223	16.84	0.00	0.00	12.12	21.08	66.44	62.33	21.44	16.59	23.12	60.54	16.45	26.91	18.98	4.93	41.44	7.62	
<b>Limited Review:</b>																			
2014 Bloomington IN MSA	8	0.60	8.37	25.00	17.37	50.00	45.14	12.50	29.13	12.50	28.84	62.50	13.76	12.50	14.85	12.50	42.56	12.50	
2014 Clinton County IN	23	1.74	0.00	0.00	8.63	8.70	61.42	65.22	29.95	26.09	19.59	60.87	16.71	30.43	18.23	4.35	45.47	4.35	
2014 Columbus IN MSA	62	4.68	0.00	0.00	16.27	20.97	66.48	74.19	17.25	4.84	21.97	74.19	17.40	17.74	20.02	6.45	40.61	1.61	
2014 Elkhart-Goshen IN	67	5.06	0.00	0.00	17.32	25.37	56.22	65.67	26.46	8.96	21.35	49.25	17.55	31.34	20.44	10.45	40.66	8.96	
2014 Evansville IN MSA	107	8.08	5.28	13.08	24.51	36.45	35.40	28.04	34.81	22.43	23.37	61.68	16.24	26.17	17.28	11.21	43.10	0.93	
2014 Fort Wayne IN MSA	104	7.85	7.50	11.54	26.70	39.42	40.25	38.46	25.50	10.58	21.49	63.46	17.94	22.12	20.06	11.54	40.51	2.88	
2014 Henry County IN	35	2.64	0.00	0.00	20.09	45.71	60.53	51.43	19.38	2.86	24.95	45.71	17.84	31.43	18.52	14.29	38.69	8.57	
2014 Indianapolis-Carmel-Anderson IN MSA	274	20.69	8.11	13.87	25.02	32.48	39.16	45.99	27.71	7.66	22.94	67.52	16.98	18.61	18.41	7.66	41.66	6.20	
2014 Lafayette-West Lafayette IN MSA	17	1.28	7.15	0.00	31.60	52.94	40.74	35.29	20.24	11.76	26.63	23.53	15.56	47.06	15.99	11.76	41.82	17.65	
2014 Michigan City-La Porte IN MSA	76	5.74	0.00	0.00	24.92	40.79	57.34	47.37	17.74	11.84	22.40	63.16	17.37	26.32	18.33	2.63	41.90	7.89	
2014 Muncie IN MSA	23	1.74	3.85	0.00	29.20	52.17	40.09	34.78	26.69	13.04	24.35	65.22	15.52	26.09	18.31	8.70	41.82	0.00	
2014 Northern Non-MSA	163	12.31	0.00	0.00	7.39	10.43	73.00	74.85	19.61	14.72	19.70	51.53	16.44	26.99	20.38	15.95	43.48	5.52	

\* Consumer Loans originated and purchased in the MA/AA as a percentage of all consumer loans originated and purchased in the rated area.

\*\* Percentage of households is based on 2010 Census Information.

**Table 13. Geographic and Borrower Distribution of Consumer Loans**

Geographic and Borrower Distribution: CONSUMER LOANS																			Geography: INDIANA				Evaluation Period: JANUARY 1, 2014 TO JUNE 30, 2015			
Assessment Area:	Geographic Distribution										Borrower Distribution															
	Total Consumer Loans		Low-Income Geographies		Moderate-Income Geographies		Middle-Income Geographies		Upper-Income Geographies		Low-Income Borrowers		Moderate-Income Borrowers		Middle-Income Borrowers		Upper-Income Borrowers									
	#	% of Total	% of Hhlds**	% of BANK Loans	% of Hhlds**	% of BANK Loans	% of Hhlds**	% of BANK Loans	% of Hhlds**	% of BANK Loans	% of Hhlds**	% of BANK Loans	% of Hhlds**	% of BANK Loans	% of Hhlds**	% of BANK Loans	% of Hhlds**	% of BANK Loans								
<b>Limited Review:</b>																										
2014 South Bend-Mishawaka IN MSA	112	8.46	4.18	7.14	29.29	38.39	36.27	35.71	30.26	18.75	23.13	60.71	17.03	25.00	18.27	11.61	41.57	2.68								
2014 Terre Haute IN MSA	30	2.27	10.36	16.67	11.40	13.33	53.96	40.00	24.29	30.00	23.88	50.00	16.70	26.67	17.53	13.33	41.88	10.00								

\* Consumer Loans originated and purchased in the MA/AA as a percentage of all consumer loans originated and purchased in the rated area.  
 \*\* Percentage of households is based on 2010 Census Information.

**Table 14. Qualified Investments**

QUALIFIED INVESTMENTS									
Geography: INDIANA									
Evaluation Period: JUNE 24, 2012 TO JULY 13, 2015									
Assessment Area:	Prior Period Investments <sup>*</sup>		Current Period Investments		Total Investments			Unfunded Commitments <sup>**</sup>	
	#	\$(000's)	#	\$(000's)	#	\$(000's)	% of Total	#	\$(000's)
<b>Full Review:</b>									
2014 Southern Non-MSA IN	0	0	7	632	7	632	11.42	0	0
<b>Limited Review:</b>									
2014 Bloomington IN MSA	0	0	1	101	1	101	1.83	0	0
2014 Clinton County IN	0	0	1	74	1	74	1.33	0	0
2014 Columbus IN MSA	0	0	1	82	1	82	1.48	0	0
2014 Elkhart-Goshen IN MSA	0	0	2	151	2	151	2.73	0	0
2014 Evansville IN MSA	0	0	4	383	4	383	6.92	0	0
2014 Fort Wayne IN MSA	0	0	7	667	7	667	12.06	0	0
2014 Henry County IN	0	0	3	80	3	80	1.45	0	0
2014 Indianapolis-Carmel-Anderson IN MSA	0	0	23	2,499	23	2,499	45.19	0	0
2014 Lafayette-West Lafayette IN MSA	0	0	1	158	1	158	2.86	0	0
2014 Michigan City-La Porte IN MSA	0	0	1	149	1	149	2.69	0	0
2014 Muncie IN MSA	0	0	1	76	1	76	1.37	0	0
2014 Northern Non-MSA IN	0	0	7	247	7	247	4.46	0	0
2014 South Bend-Mishawaka IN MSA	0	0	2	164	2	164	2.96	0	0
2014 Terre Haute IN MSA	0	0	1	69	1	69	1.25	0	0

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

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

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

DISTRIBUTION OF BRANCH DELIVERY SYSTEM AND BRANCH OPENINGS/CLOSINGS																	Geography: INDIANA				Evaluation Period: JANUARY 1, 2014 TO JUNE 30, 2015			
MA/Assessment Area:	Deposits	Branches						Branch Openings/Closings						Population										
	% of Rated Area Deposits in AA	# of BANK Branches	% of Rated Area Branches in AA	Location of Branches by Income of Geographies (%)				# of Branch Openings	# of Branch Closings	Net change in Location of Branches (+ or -)				% of Population within Each Geography										
				Low	Mod	Mid	Upp			Low	Mod	Mid	Upp	Low	Mod	Mid	Upp							
<b>Full Review:</b>																								
2014 Southern Non-MSA IN	16.95	7	17.07	0.00	42.80	28.60	28.60	0	0	0	0	0	0	0.00	12.72	65.16	22.12							
<b>Limited Review:</b>																								
2014 Bloomington IN	3.14	1	2.44	0.00	0.00	100.00	0.00	0	0	0	0	0	0	16.38	14.47	42.41	26.74							
2014 Clinton County IN	1.99	1	2.44	0.00	0.00	0.00	100.00	0	0	0	0	0	0	0.00	11.06	59.41	29.53							
2014 Columbus IN	5.29	2	4.88	0.00	50.00	0.00	50.00	0	0	0	0	0	0	0.00	15.52	67.10	17.38							
2014 Elkhart-Goshen IN MSA	4.07	2	4.88	0.00	0.00	100.00	0.00	0	0	0	0	0	0	0.00	17.02	53.84	29.14							
2014 Evansville IN	11.34	3	7.33	0.00	66.67	0.00	33.33	0	1	0	0	-1	0	4.97	21.75	35.75	37.53							
2014 Fort Wayne IN	6.68	4	10.80	0.00	50.00	50.00	0.00	0	0	0	0	0	0	7.72	24.57	39.52	28.03							
2014 Henry County IN	1.64	1	2.44	0.00	0.00	0.00	100.00	0	0	0	0	0	0	0.00	19.25	62.51	18.24							
2014 Indianapolis-Carmel-Anderson IN	25.11	8	17.40	0.00	37.50	37.50	25.00	0	0	0	0	0	0	7.94	23.37	38.88	29.62							
2014 Lafayette-West Lafayette IN MSA	0.95	1	2.44	0.00	0.00	0.00	100.00	0	0	0	0	0	0	7.42	26.27	41.93	18.51							
2014 Michigan City-La Porte IN MSA	4.93	2	4.88	0.00	100.00	0.00	0.00	0	0	0	0	0	0	0.00	24.81	58.91	16.28							
2014 Muncie IN MSA	1.76	1	2.44	0.00	100.00	0.00	0.00	0	0	0	0	0	0	3.09	26.00	38.49	26.59							
2014 Northern Non-MSA IN	6.67	4	10.80	0.00	50.00	50.00	0.00	0	0	0	0	0	0	0.00	7.19	72.82	19.99							
2014 South Bend	3.82	2	4.88	0.00	100.00	0.00	0.00	0	0	0	0	0	0	4.59	27.75	36.27	31.40							
2014 Terre Haute IN	5.66	2	4.88	0.00	0.00	50.00	50.00	0	0	0	0	0	0	11.37	10.74	53.95	23.93							

Kentucky

**Table 1. Lending Volume**

LENDING VOLUME												
Geography: KENTUCKY												
Evaluation Period: JANUARY 1, 2014 TO JUNE 30, 2015												
Assessment Area (2014):	% of Rated Area Loans (#) in MA/AA <sup>1</sup>	Home Mortgage		Small Loans to Businesses		Small Loans to Farms		Community Development Loans <sup>2</sup>		Total Reported Loans		% of Rated Area Deposits in MA/AA <sup>3</sup>
		#	\$ (000's)	#	\$ (000's)	#	\$ (000's)	#	\$ (000's)	#	\$(000's)	
<b>Full Review:</b>												
2014 Lexington-Fayette KY MSA	26.47	31	3,886	22	247	0	0	1	45	54	4,178	17.81
<b>Limited Review:</b>												
2014 Adair County KY	0.98	0	0	0	0	0	0	2	15	2	15	5.65
2014 Bowling Green KY MSA	5.88	4	369	6	90	0	0	2	15	12	474	6.13
2014 Central Non-MSA KY	22.06	22	2,783	20	43	0	0	3	70	45	2,896	28.49
2014 Elizabethtown-Fort Knox KY MSA	8.83	11	1,189	5	9	0	0	2	20	18	1,218	4.31
2014 Harrison County KY	1.96	2	104	2	6	0	0	0	0	4	110	1.98
2014 Owensboro KY MSA	10.78	21	2,411	0	0	0	0	1	5	22	2,416	2.46
2014 Rowan County KY	1.96	2	182	0	0	0	0	2	20	4	202	8.26
2014 Southwest Non-MSA KY	16.18	25	3,381	6	7	0	0	2	25	33	3,413	12.78
2014 Western Non-MSA KY	4.90	6	512	2	4	0	0	2	25	10	541	12.14

<sup>1</sup> Loan Data as of June 30, 2015. Rated area refers to either state or multistate MA rating area.  
<sup>2</sup> The evaluation period for Community Development Loans is from January 01, 2014 to July 13, 2015.  
<sup>3</sup> Deposit Data as of June 30, 2014. Rated Area refers to either the state, multistate MA, or institution, as appropriate.

**Table 1. Other Products**

LENDING VOLUME		Geography: KENTUCKY						Evaluation Period: JANUARY 1, 2014 TO JUNE 30, 2015						
Assessment Area (2014):	% of Rated Area Loans (#) in MA/AA*	Total Optional Loans**		Small Business Real Estate Secured**		Home Equity**		Motor Vehicle**		Credit Card**		Other Secured Consumer**		% of Rated Area Deposits in AA***
		#	\$ (000's)	#	\$ (000's)	#	\$ (000's)	#	\$ (000's)	#	\$ (000's)	#	\$ (000's)	
<b>Full Review:</b>														
2014 Lexington-Fayette KY MSA	13.06	79	99	0	0	0	0	0	0	0	0	0	0	17.81
<b>Limited Review:</b>														
2014 Adair County KY	4.46	27	40	0	0	0	0	0	0	0	0	0	0	5.65
2014 Bowling Green KY MSA	5.29	32	40	0	0	0	0	0	0	0	0	0	0	6.13
2014 Central Non-MSA KY	34.55	209	235	0	0	0	0	0	0	0	0	0	0	28.49
2014 Elizabethtown-Fort Knox KY MSA	9.09	55	59	0	0	0	0	0	0	0	0	0	0	4.31
2014 Harrison County KY	3.97	24	24	0	0	0	0	0	0	0	0	0	0	1.98
2014 Owensboro KY MSA	3.80	23	28	0	0	0	0	0	0	0	0	0	0	2.46
2014 Rowan County KY	2.98	18	23	0	0	0	0	0	0	0	0	0	0	8.26
2014 Southwest Non-MSA KY	8.60	52	71	0	0	0	0	0	0	0	0	0	0	12.78
2014 Western Non-MSA KY	14.21	86	95	0	0	0	0	0	0	0	0	0	0	12.14

\* Loan Data as of June 30, 2015. Rated area refers to either state or multistate MA rating area.

\*\* The evaluation period for Optional Product Line(s) is from January 01, 2014 to June 30, 2015.

\*\*\* Deposit Data as of June 30, 2014. Rated Area refers to either the state, multistate MA, or institution, as appropriate.

**Table 1. Other Products**

LENDING VOLUME		Geography: KENTUCKY		Evaluation Period: JANUARY 1, 2014 TO JUNE 30, 2015	
Assessment Area (2014):	Other Unsecured Consumer Loans*		Other Optional Loans*		
	#	\$ (000's)	#	\$ (000's)	
<b>Full Review:</b>					
2014 Lexington-Fayette KY MSA	79	99	0	0	
<b>Limited Review:</b>					
2014 Adair County KY	27	40	0	0	
2014 Bowling Green KY MSA	32	40	0	0	
2014 Central Non-MSA KY	209	235	0	0	
2014 Elizabethtown-Fort Knox KY MSA	55	59	0	0	
2014 Harrison County KY	24	24	0	0	
2014 Owensboro KY MSA	23	28	0	0	
2014 Rowan County KY	18	23	0	0	
2014 Southwest Non-MSA KY	52	71	0	0	
2014 Western Non-MSA KY	86	95	0	0	

\* The evaluation period for Optional Product Line(s) is from January 01, 2014 to June 30, 2015.



**Table 4. Geographic Distribution of Home Mortgage Refinance Loans**

Geographic Distribution: HOME MORTGAGE REFINANCE			Geography: KENTUCKY						Evaluation Period: JANUARY 1, 2014 TO JUNE 30, 2015						
Assessment Area:	Total Home Mortgage Refinance Loans		Low-Income Geographies		Moderate-Income Geographies		Middle-Income Geographies		Upper-Income Geographies		Market Share (%) by Geography				
	#	% of Total**	% Owner Occ Units***	% BANK Loans****	% Owner Occ Units***	% BANK Loans	% Owner Occ Units***	% BANK Loans	% Owner Occ Units***	% BANK Loans	Overall	Low	Mod	Mid	Upp
<b>Full Review:</b>															
2014 Lexington-Fayette KY MSA	30	24.79	5.01	6.67	21.09	26.67	37.40	36.67	36.50	30.00	0.78	0.54	1.06	0.80	0.63
<b>Limited Review:</b>															
2014 Adair County KY	0	0.00	0.00	0.00	0.00	0.00	89.92	0.00	10.08	0.00	0.00	0.00	0.00	0.00	0.00
2014 Bowling Green KY MSA	4	3.31	3.46	25.00	8.74	0.00	45.98	25.00	41.82	50.00	0.36	2.50	0.00	0.21	0.38
2014 Central Non-MSA KY	22	18.18	0.66	0.00	15.35	13.64	40.82	31.82	43.18	54.55	0.87	0.00	1.30	0.76	0.88
2014 Elizabethtown-Fort Knox KY MSA	11	9.09	0.00	0.00	7.91	0.00	68.05	54.55	24.04	45.45	0.30	0.00	0.00	0.34	0.28
2014 Harrison County KY	2	1.65	0.00	0.00	0.00	0.00	46.49	0.00	53.51	100.00	1.67	0.00	0.00	0.00	2.41
2014 Owensboro KY MSA	21	17.36	2.61	0.00	8.19	9.52	65.25	71.43	23.94	19.05	1.76	0.00	3.23	1.89	1.12
2014 Rowan County KY	2	1.65	0.00	0.00	39.32	0.00	0.00	0.00	60.68	100.00	2.08	0.00	0.00	0.00	2.74
2014 Southwest Non-MSA KY	23	19.01	0.61	0.00	4.90	4.35	39.43	26.09	55.05	69.57	1.10	0.00	2.50	0.77	1.23
2014 Western Non-MSA KY	6	4.96	0.00	0.00	12.61	0.00	60.49	50.00	26.90	50.00	0.63	0.00	0.00	0.29	1.45

\* Based on 2014 Peer Mortgage Data – US and PR

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

\*\*\* Percentage of Owner Occupied Units is the number of owner occupied units in a particular geography divided by the number of owner occupied housing units in the area based on 2010 Census information.

\*\*\*\* Data shown includes only One to Four-family and manufactured housing. (Property type of 1 or 2)

**Table 6. Geographic Distribution of Small Loans to Businesses**

Geographic Distribution: SMALL LOANS TO BUSINESSES			Geography: KENTUCKY				Evaluation Period: JANUARY 1, 2014 TO JUNE 30, 2015					Market Share (%) by Geography <sup>1</sup>				
Assessment Area:	Total Small Business Loans		Low-Income Geographies		Moderate-Income Geographies		Middle-Income Geographies		Upper-Income Geographies		Overall	Low	Mod	Mid	Upp	
	#	% of Total <sup>2</sup>	% of Businesses <sup>3</sup>	% BANK Loans	% of Businesses <sup>3</sup>	% BANK Loans	% of Businesses <sup>3</sup>	% BANK Loans	% of Businesses <sup>3</sup>	% BANK Loans						
<b>Full Review:</b>																
2014 Lexington-Fayette KY MSA	22	34.92	8.27	45.45	23.18	13.64	35.88	27.27	32.67	13.64	0.26	1.65	0.22	0.12	0.08	
<b>Limited Review:</b>																
2014 Adair County KY	0	0.00	0.00	0.00	0.00	0.00	94.87	0.00	5.13	0.00	0.00	0.00	0.00	0.00	0.00	
2014 Bowling Green KY MSA	6	9.52	11.29	16.67	5.31	0.00	47.26	66.67	36.09	16.67	0.27	0.58	0.00	0.38	0.12	
2014 Central Non-MSA KY	20	31.75	0.42	0.00	9.58	25.00	48.25	40.00	41.75	35.00	0.36	0.00	0.68	0.34	0.35	
2014 Elizabethtown-Fort Knox KY MSA	5	7.94	0.00	0.00	12.61	20.00	60.85	40.00	26.29	40.00	0.51	0.00	0.73	0.36	0.81	
2014 Harrison County KY	2	3.17	0.00	0.00	0.00	0.00	35.60	0.00	64.40	100.00	1.40	0.00	0.00	0.00	2.44	
2014 Owensboro KY MSA	0	0.00	11.23	0.00	10.55	0.00	54.55	0.00	23.67	0.00	0.00	0.00	0.00	0.00	0.00	
2014 Rowan County KY	0	0.00	0.00	0.00	36.35	0.00	0.00	0.00	63.65	0.00	0.00	0.00	0.00	0.00	0.00	
2014 Southwest Non-MSA KY	6	9.52	5.49	0.00	7.81	16.67	37.54	50.00	49.16	33.33	0.10	0.00	0.00	0.14	0.10	
2014 Western Non-MSA KY	2	3.17	0.00	0.00	19.09	0.00	56.75	100.00	24.16	0.00	0.00	0.00	0.00	0.00	0.00	

\* Based on 2014 Peer Small Business Data – US and PR

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

\*\*\* Source Data - Dun and Bradstreet (2014).

**Table 10. Borrower Distribution of Home Mortgage Refinance Loans**

Borrower Distribution: HOME MORTGAGE REFINANCE												Geography: KENTUCKY				Evaluation Period: JANUARY 1, 2014 TO JUNE 30, 2015				
Assessment Area:	Total Home Mortgage Refinance Loans		Low-Income Borrowers		Moderate-Income Borrowers		Middle-Income Borrowers		Upper-Income Borrowers		Market Share <sup>1</sup>									
	#	% of Total <sup>**</sup>	% Families <sup>***</sup>	% BANK Loans <sup>****</sup>	% Families <sup>26</sup>	% BANK Loans <sup>****</sup>	% Families <sup>***</sup>	% BANK Loans <sup>****</sup>	% Families <sup>***</sup>	% BANK Loans <sup>****</sup>	Overall	Low	Mod	Mid	Upp					
<b>Full Review:</b>																				
2014 Lexington-Fayette KY MSA	30	24.79	23.47	26.67	16.08	20.00	20.19	13.33	40.26	40.00	1.00	2.18	1.49	0.54	0.72					
<b>Limited Review:</b>																				
2014 Adair County KY	0	0.00	26.56	0.00	14.75	0.00	23.76	0.00	34.93	0.00	0.00	0.00	0.00	0.00	0.00					
2014 Bowling Green KY MSA	4	3.31	20.51	0.00	16.08	50.00	19.22	25.00	44.19	25.00	0.48	1.30	0.60	0.53	0.25					
2014 Central Non-MSA KY	22	18.18	21.20	0.00	15.16	18.18	18.13	13.64	45.51	68.18	1.07	0.00	1.34	0.75	1.26					
2014 Elizabethtown-Fort Knox KY MSA	11	9.09	19.21	0.00	17.73	36.36	21.11	36.36	41.95	27.27	0.44	0.00	0.61	0.87	0.23					
2014 Harrison County KY	2	1.65	16.24	50.00	16.70	0.00	16.43	0.00	50.63	50.00	1.92	14.29	0.00	0.00	1.39					
2014 Owensboro KY MSA	21	17.36	20.33	9.52	16.13	23.81	24.01	19.05	39.54	47.62	2.18	1.23	2.14	1.27	3.21					
2014 Rowan County KY	2	1.65	24.79	0.00	15.01	50.00	15.50	0.00	44.71	50.00	2.53	0.00	4.76	0.00	2.56					
2014 Southwest Non-MSA KY	23	19.01	16.09	0.00	13.79	17.39	19.51	8.70	50.62	73.91	1.39	0.00	3.03	0.00	1.57					
2014 Western Non-MSA KY	6	4.96	18.83	0.00	16.47	50.00	20.25	0.00	44.46	50.00	0.71	0.00	3.37	0.65	0.00					

\* Based on 2014 Peer Mortgage Data – US and PR

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

\*\*\* Percentage of Families is based on the 2010 Census information.

\*\*\*\* As a percentage of loans with borrower income information available. No information was available for 0.0% of loans originated and purchased by bank.

26 Data shown includes only One to Four-family and manufactured housing. (Property type of 1 or 2)

**Table 11. Borrower Distribution of Small Loans to Businesses**

Borrower Distribution: SMALL LOANS TO BUSINESSES			Geography: KENTUCKY		Evaluation Period: JANUARY 1, 2014 TO JUNE 30, 2015				
Assessment Area:	Total Small Loans to Businesses		Businesses With Revenues of \$1 million or less		Loans by Original Amount Regardless of Business Size			Market Share <sup>1</sup>	
	#	% of Total <sup>2</sup>	% of Businesses <sup>3</sup>	% BANK Loans <sup>4</sup>	\$100,000 or less	>\$100,000 to \$250,000	>\$250,000 to \$1,000,000	All	Rev\$ 1 Million or Less
<b>Full Review:</b>									
2014 Lexington-Fayette KY MSA	22	34.92	70.88	90.91	90.91	9.09	0.00	0.26	0.51
<b>Limited Review:</b>									
2014 Adair County KY	0	0.00	75.30	0.00	0.00	0.00	0.00	0.00	0.00
2014 Bowling Green KY MSA	6	9.52	69.33	83.33	100.00	0.00	0.00	0.27	0.44
2014 Central Non-MSA KY	20	31.75	71.50	95.00	100.00	0.00	0.00	0.36	0.69
2014 Elizabethtown-Fort Knox KY MSA	5	7.94	72.04	100.00	100.00	0.00	0.00	0.51	1.31
2014 Harrison County KY	2	3.17	72.67	100.00	100.00	0.00	0.00	1.40	3.64
2014 Owensboro KY MSA	0	0.00	69.14	0.00	0.00	0.00	0.00	0.00	0.00
2014 Rowan County KY	0	0.00	69.34	0.00	0.00	0.00	0.00	0.00	0.00
2014 Southwest Non-MSA KY	6	9.52	72.19	100.00	100.00	0.00	0.00	0.10	0.25
2014 Western Non-MSA KY	2	3.17	69.45	100.00	100.00	0.00	0.00	0.00	0.00

\* Based on 2014 Peer Small Business Data – US and PR

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

\*\*\* Businesses with revenues of \$1 million or less as a percentage of all businesses (Source D&B - 2014).

\*\*\*\* Small loans to businesses with revenues of \$1 million or less as a percentage of all loans reported as small loans to businesses. No information was available for 6.35% of small loans to businesses originated and purchased by the bank.

**Table 13. Geographic and Borrower Distribution of Consumer Loans**

Geographic and Borrower Distribution: CONSUMER LOANS																		Geography: KENTUCKY				Evaluation Period: JANUARY 1, 2014 TO JUNE 30, 2015			
Assessment Area:	Geographic Distribution										Borrower Distribution														
	Total Consumer Loans		Low-Income Geographies		Moderate-Income Geographies		Middle-Income Geographies		Upper-Income Geographies		Low-Income Borrowers		Moderate-Income Borrowers		Middle-Income Borrowers		Upper-Income Borrowers								
	#	% of Total*	% of Hhlds**	% of BANK Loans	% of Hhlds**	% of BANK Loans	% of Hhlds**	% of BANK Loans	% of Hhlds**	% of BANK Loans	% of Hhlds**	% of BANK Loans	% of Hhlds**	% of BANK Loans	% of Hhlds**	% of BANK Loans	% of Hhlds**	% of BANK Loans							
<b>Full Review:</b>																									
2014 Lexington-Fayette KY MSA	79	13.06	9.38	21.52	27.79	46.84	34.22	26.58	28.61	5.06	26.08	74.68	15.83	20.25	17.04	3.80	41.05	1.27							
<b>Limited Review:</b>																									
2014 Adair County KY	27	4.46	0.00	0.00	0.00	0.00	91.49	92.59	8.51	7.41	31.88	51.85	15.11	22.22	15.59	14.81	37.42	11.11							
2014 Bowling Green KY MSA	32	5.29	8.78	12.50	8.25	15.63	49.64	43.75	33.30	28.13	23.76	46.88	15.58	31.25	16.78	9.38	43.88	12.50							
2014 Central Non-MSA KY	209	34.55	0.79	0.00	15.41	22.97	42.41	45.93	41.38	31.10	23.74	56.46	13.82	26.32	15.72	14.35	46.71	2.87							
2014 Elizabethtown-Fort Knox KY	55	9.09	0.00	0.00	9.92	25.45	67.34	54.55	22.70	20.00	22.65	76.36	16.27	20.00	19.02	1.82	42.07	1.82							
2014 Harrison County KY	24	3.97	0.00	0.00	0.00	0.00	43.40	62.50	56.60	37.50	23.16	70.83	14.54	25.00	12.60	0.00	49.69	4.17							
2014 Owensboro KY MSA	23	3.80	5.53	21.74	10.53	13.04	63.98	47.83	19.96	17.39	24.74	65.22	15.56	26.09	18.63	8.70	41.07	0.00							
2014 Rowan County KY	18	2.98	0.00	0.00	40.84	72.22	0.00	0.00	59.16	27.78	29.62	50.00	15.57	38.89	11.84	11.11	42.97	0.00							
2014 Southwest Non-MSA KY	52	8.60	1.78	1.92	7.13	23.08	39.53	46.15	51.57	28.85	21.12	42.31	13.97	26.92	16.05	11.54	48.86	19.23							
2014 Western Non-MSA KY	86	14.21	0.00	0.00	15.59	27.91	58.00	46.51	26.41	25.58	22.86	60.47	14.83	30.23	16.23	8.14	46.08	1.16							

\* Consumer Loans originated and purchased in the MA/AA as a percentage of all consumer loans originated and purchased in the rated area.

\*\* Percentage of households is based on 2010 Census Information.

**Table 14. Qualified Investments**

QUALIFIED INVESTMENTS									
Geography: KENTUCKY									
Evaluation Period: JUNE 24, 2012 TO JULY 13, 2015									
Assessment Area:	Prior Period Investments*		Current Period Investments		Total Investments			Unfunded Commitments**	
	#	\$(000's)	#	\$(000's)	#	\$(000's)	% of Total	#	\$(000's)
<b>Full Review:</b>									
2014 Lexington-Fayette KY MSA	0	0	9	786	9	786	35.82	0	0
<b>Limited Review:</b>									
2014 Adair County KY	0	0	2	197	2	197	8.98	0	0
2014 Bowling Green KY MSA	0	0	1	139	1	139	6.34	0	0
2014 Central Non-MSA KY	0	0	4	331	4	331	15.09	0	0
2014 Elizabethtown-Fort Knox KY MSA	0	0	2	117	2	117	5.33	0	0
2014 Harrison County KY	0	0	1	116	1	116	5.29	0	0
2014 Owensboro KY MSA	0	0	1	183	1	183	8.34	0	0
2014 Rowan County KY	0	0	2	201	2	201	9.16	0	0
2014 Southwest Non-MSA KY	0	0	1	124	1	124	5.65	0	0
2014 Western Non-MSA KY	0	0	0	0	0	0	0.00	0	0

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

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

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

DISTRIBUTION OF BRANCH DELIVERY SYSTEM AND BRANCH OPENINGS/CLOSINGS Geography: KENTUCKY Evaluation Period: JANUARY 1, 2014 TO JUNE 30, 2015																	
MA/Assessment Area:	Deposits	Branches						Branch Openings/Closings						Population			
	% of Rated Area Deposits in AA	# of BANK Branches	% of Rated Area Branches in AA	Location of Branches by Income of Geographies (%)				# of Branch Openings	# of Branch Closings	Net change in Location of Branches (+ or -)				% of Population within Each Geography			
				Low	Mod	Mid	Upp			Low	Mod	Mid	Upp	Low	Mod	Mid	Upp
<b>Full Review:</b>																	
2014 Lexington-Fayette KY MSA	17.81	4	21.05	0.00	25.00	50.00	25.00	0	0	0	0	0	0	10.72	26.07	33.70	29.50
<b>Limited Review:</b>																	
2014 Adair County KY	5.65	1	5.26	0.00	0.00	100.00	0.00	0	0	0	0	0	0	0.00	0.00	92.48	7.52
2014 Bowling Green KY MSA	6.13	1	5.26	0.00	0.00	100.00	0.00	0	0	0	0	0	0	11.76	8.48	45.92	33.82
2014 Central Non-MSA	28.49	5	26.32	0.00	20.00	40.00	40.00	0	0	0	0	0	0	1.46	14.95	42.40	41.19
2014 Elizabethtown-Fort Knox KY MSA	4.31	1	5.26	0.00	0.00	0.00	100.00	0	0	0	0	0	0	0.00	8.34	67.01	23.38
2014 Harrison County	1.98	0	0.00	0.00	0.00	0.00	0.00	0	1	0	0	0	-1	0.00	0.00	45.41	54.59
2014 Owensboro KY	2.46	1	5.26	0.00	0.00	100.00	0.00	0	0	0	0	0	0	5.65	11.04	62.87	20.45
2014 Rowan County	8.26	1	5.26	0.00	0.00	0.00	100.00	0	0	0	0	0	0	0.00	39.10	0.00	60.90
2014 Southwest Non-MSA KY	12.78	2	10.53	50.00	0.00	0.00	50.00	0	0	0	0	0	0	1.60	6.91	39.12	52.38
2014 Western Non-MSA KY	12.14	3	15.80	0.00	0.00	33.33	66.67	0	0	0	0	0	0	0.00	15.24	58.91	25.85

Louisiana

Table 1. Lending Volume

LENDING VOLUME		Geography: LOUISIANA						Evaluation Period: JANUARY 1, 2014 TO JUNE 30, 2015				
Assessment Area (2014):	% of Rated Area Loans (#) in MA/AA*	Home Mortgage		Small Loans to Businesses		Small Loans to Farms		Community Development Loans**		Total Reported Loans		% of Rated Area Deposits in MA/AA***
		#	\$ (000's)	#	\$ (000's)	#	\$ (000's)	#	\$ (000's)	#	\$ (000's)	
<b>Full Review:</b>												
2014 Southern Non-MSA LA	5.19	17	2,151	1	1	0	0	1	20	19	2,172	12.36
<b>Limited Review:</b>												
2014 Alexandria LA MSA	9.02	22	2,647	10	247	0	0	1	10	33	2,904	5.54
2014 Baton Rouge LA MSA	15.30	31	3,697	24	627	0	0	1	10	56	4,334	13.07
2014 Hammond LA MSA	5.46	16	2,092	3	56	0	0	1	10	20	2,158	5.54
2014 Houma-Thibodaux LA	7.38	26	3,695	0	0	0	0	1	5	27	3,700	3.91
2014 Lafayette LA MSA	8.47	26	3,445	4	237	0	0	1	5	31	3,687	6.49
2014 Lake Charles LA MSA	9.84	30	4,189	4	14	0	0	2	20	36	4,223	5.37
2014 Lincoln Parish LA	0.82	1	96	1	1	0	0	1	5	3	102	3.70
2014 Monroe LA MSA	8.74	24	3,124	7	91	0	0	1	5	32	3,220	6.40
2014 New Orleans-Metairie LA	20.77	36	4,320	38	861	0	0	2	35	76	5,216	31.63
2014 Shreveport-Bossier City LA MSA	8.74	24	2,432	7	76	0	0	1	5	32	2,513	3.77

\* Loan Data as of June 30, 2015. Rated area refers to either state or multistate MA rating area.

\*\* The evaluation period for Community Development Loans is from January 01, 2014 to July 13, 2015.

\*\*\* Deposit Data as of June 30, 2014. Rated Area refers to either the state, multistate MA, or institution, as appropriate.



**Table 1. Other Products**

LENDING VOLUME		Geography: LOUISIANA						Evaluation Period: JANUARY 1, 2014 TO JUNE 30, 2015						
Assessment Area (2014):	% of Rated Area Loans (#) in MA/AA'	Total Optional Loans**		Small Business Real Estate Secured**		Home Equity**		Motor Vehicle**		Credit Card**		Other Secured Consumer**		% of Rated Area Deposits in AA***
		#	\$ (000's)	#	\$ (000's)	#	\$ (000's)	#	\$ (000's)	#	\$ (000's)	#	\$(000's)	
<b>Full Review:</b>														
2014 Southern Non-MSA LA	12.96	71	85	0	0	0	0	0	0	0	0	0	0	10.64
<b>Limited Review:</b>														
2014 Alexandria LA MSA	3.83	21	28	0	0	0	0	0	0	0	0	0	0	6.57
2014 Baton Rouge LA MSA	6.57	36	47	0	0	0	0	0	0	0	0	0	0	11.96
2014 Hammond LA MSA	4.93	27	31	0	0	0	0	0	0	0	0	0	0	5.26
2014 Houma-Thibodaux LA MSA	4.74	26	32	0	0	0	0	0	0	0	0	0	0	4.71
2014 Lafayette LA MSA	6.39	35	52	0	0	0	0	0	0	0	0	0	0	6.02
2014 Lake Charles LA MSA	6.20	34	38	0	0	0	0	0	0	0	0	0	0	5.91
2014 Lincoln Parish LA	4.01	22	28	0	0	0	0	0	0	0	0	0	0	4.38
2014 Monroe LA MSA	11.13	61	72	0	0	0	0	0	0	0	0	0	0	7.84
2014 New Orleans-Metairie LA MSA	35.22	193	229	0	0	0	0	0	0	0	0	0	0	28.61
2014 Shreveport-Bossier City LA MSA	4.01	22	33	0	0	0	0	0	0	0	0	0	0	4.93

\* Loan Data as of June 30, 2015. Rated area refers to either state or multistate MA rating area.

\*\* The evaluation period for Optional Product Line(s) is from January 01, 2014 to June 30, 2015.

\*\*\* Deposit Data as of June 30, 2014. Rated Area refers to either the state, multistate MA, or institution, as appropriate.

**Table 1. Other Products**

LENDING VOLUME		Geography: LOUISIANA		Evaluation Period: JANUARY 1, 2014 TO JUNE 30, 2015	
Assessment Area (2014):	Other Unsecured Consumer Loans*		Other Optional Loans*		
	#	\$ (000's)	#	\$ (000's)	
<b>Full Review:</b>					
2014 Southern Non-MSA LA	71	85	0	0	
<b>Limited Review:</b>					
2014 Alexandria LA MSA	21	28	0	0	
2014 Baton Rouge LA MSA	36	47	0	0	
2014 Hammond LA MSA	27	31	0	0	
2014 Houma-Thibodaux LA MSA	26	32	0	0	
2014 Lafayette LA MSA	35	52	0	0	
2014 Lake Charles LA MSA	34	38	0	0	
2014 Lincoln Parish LA	22	28	0	0	
2014 Monroe LA MSA	61	72	0	0	
2014 New Orleans-Metairie LA MSA	193	229	0	0	
2014 Shreveport-Bossier City LA MSA	22	33	0	0	

\* The evaluation period for Optional Product Line(s) is from January 01, 2014 to June 30, 2015.

**Table 4. Geographic Distribution of Home Mortgage Refinance Loans**

Geographic Distribution: HOME MORTGAGE REFINANCE			Geography: LOUISIANA						Evaluation Period: JANUARY 1, 2014 TO JUNE 30, 2015						
Assessment Area:	Total Home Mortgage Refinance Loans		Low-Income Geographies		Moderate-Income Geographies		Middle-Income Geographies		Upper-Income Geographies		Market Share (%) by Geography <sup>1</sup>				
	#	% of Total <sup>**</sup>	% Owner Occ Units <sup>***</sup>	% BANK Loans <sup>****</sup>	% Owner Occ Units <sup>***</sup>	% BANK Loans	% Owner Occ Units <sup>***</sup>	% BANK Loans	% Owner Occ Units <sup>***</sup>	% BANK Loans	Overall	Low	Mod	Mid	Upp
<b>Full Review:</b>															
2014 Southern Non-MSA LA	17	7.02	3.88	0.00	18.78	23.53	35.19	23.53	42.16	52.94	1.05	0.00	0.67	0.71	1.38
<b>Limited Review:</b>															
2014 Alexandria LA MSA	22	9.09	4.98	0.00	11.48	18.18	42.16	40.91	41.39	40.91	0.88	0.00	2.07	1.37	0.29
2014 Baton Rouge LA MSA	29	11.98	8.89	3.45	15.92	17.24	21.46	20.69	53.73	58.62	0.78	0.00	1.16	0.54	0.85
2014 Hammond LA MSA	14	5.79	0.00	0.00	23.47	35.71	56.73	57.14	19.80	7.14	0.78	0.00	3.01	0.53	0.00
2014 Houma-Thibodaux LA MSA	24	9.92	0.00	0.00	25.19	33.33	54.90	37.50	19.91	29.17	0.91	0.00	1.62	0.56	1.18
2014 Lafayette LA MSA	25	10.33	2.14	0.00	20.70	24.00	45.04	16.00	32.12	60.00	0.84	0.00	1.18	0.35	1.20
2014 Lake Charles LA MSA	30	12.40	4.91	0.00	17.46	16.67	48.44	46.67	29.19	36.67	1.20	0.00	0.47	1.19	1.72
2014 Lincoln Parish LA	1	0.41	4.72	0.00	20.13	0.00	23.60	100.00	51.55	0.00	0.26	0.00	0.00	1.27	0.00
2014 Monroe LA MSA	23	9.50	5.32	0.00	17.56	13.04	44.01	47.83	33.11	39.13	0.72	0.00	1.01	0.85	0.51
2014 New Orleans-Metairie LA MSA	34	14.05	4.49	5.88	17.77	20.59	41.82	47.06	35.93	26.47	0.37	0.48	0.51	0.43	0.24
2014 Shreveport-Bossier City LA MSA	23	9.50	3.71	0.00	16.80	21.74	39.13	56.52	40.36	21.74	0.54	0.00	1.69	0.65	0.26

\* Based on 2014 Peer Mortgage Data – US and PR

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

\*\*\* Percentage of Owner Occupied Units is the number of owner occupied units in a particular geography divided by the number of owner occupied housing units in the area based on 2010 Census information.

\*\*\*\* Data shown includes only One to Four-family and manufactured housing. (Property type of 1 or 2)

**Table 6. Geographic Distribution of Small Loans to Businesses**

Geographic Distribution: SMALL LOANS TO BUSINESSES			Geography: LOUISIANA						Evaluation Period: JANUARY 1, 2014 TO JUNE 30, 2015						
Assessment Area:	Total Small Business Loans		Low-Income Geographies		Moderate-Income Geographies		Middle-Income Geographies		Upper-Income Geographies		Market Share (%) by Geography <sup>1</sup>				
	#	% of Total <sup>**</sup>	% of Businesses <sup>***</sup>	% BANK Loans	% of Businesses <sup>***</sup>	% BANK Loans	% of Businesses <sup>***</sup>	% BANK Loans	% of Businesses <sup>***</sup>	% BANK Loans	Overall	Low	Mod	Mid	Upp
<b>Full Review:</b>															
2014 Southern Non-MSA LA	1	1.01	5.40	0.00	22.92	0.00	32.15	100.00	39.53	0.00	0.06	0.00	0.00	0.20	0.00
<b>Limited Review:</b>															
2014 Alexandria LA MSA	10	10.10	10.03	0.00	13.07	30.00	34.26	20.00	42.33	50.00	0.42	0.00	1.20	0.29	0.43
2014 Baton Rouge LA MSA	24	24.24	11.48	4.17	18.40	33.33	19.03	25.00	51.03	37.50	0.26	0.14	0.52	0.37	0.18
2014 Hammond LA MSA	3	3.03	0.00	0.00	27.85	0.00	56.07	100.00	16.09	0.00	0.13	0.00	0.00	0.25	0.00
2014 Houma-Thibodaux LA MSA	0	0.00	0.00	0.00	24.87	0.00	53.77	0.00	21.36	0.00	0.00	0.00	0.00	0.00	0.00
2014 Lafayette LA MSA	4	4.04	1.84	0.00	19.70	0.00	44.47	50.00	33.91	50.00	0.03	0.00	0.00	0.03	0.06
2014 Lake Charles LA MSA	4	4.04	6.20	0.00	26.60	50.00	42.39	50.00	24.67	0.00	0.09	0.00	0.13	0.15	0.00
2014 Lincoln Parish LA	1	1.01	5.52	0.00	20.84	0.00	18.55	0.00	55.09	100.00	0.12	0.00	0.00	0.00	0.18
2014 Monroe LA MSA	7	7.07	10.79	14.29	21.49	28.57	36.11	28.57	31.46	28.57	0.16	0.00	0.18	0.18	0.20
2014 New Orleans-Metairie LA MSA	38	38.38	6.70	18.42	19.77	21.05	33.04	36.84	40.36	23.68	0.13	0.39	0.13	0.19	0.06
2014 Shreveport-Bossier City LA MSA	7	7.07	11.47	28.57	21.67	28.57	34.24	42.86	32.51	0.00	0.13	0.29	0.21	0.17	0.00

\* Based on 2014 Peer Small Business Data – US and PR

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

\*\*\* Source Data - Dun and Bradstreet (2014).

**Table 10. Borrower Distribution of Home Mortgage Refinance Loans**

Borrower Distribution: HOME MORTGAGE REFINANCE		Geography: LOUISIANA						Evaluation Period: JANUARY 1, 2014 TO JUNE 30, 2015							
Assessment Area:	Total Home Mortgage Refinance Loans		Low-Income Borrowers		Moderate-Income Borrowers		Middle-Income Borrowers		Upper-Income Borrowers		Market Share <sup>1</sup>				
	#	% of Total <sup>2</sup>	% Families <sup>3</sup>	% BANK Loans <sup>4</sup>	% Families <sup>27</sup>	% BANK Loans <sup>4</sup>	% Families <sup>3</sup>	% BANK Loans <sup>4</sup>	% Families <sup>3</sup>	% BANK Loans <sup>4</sup>	Overall	Low	Mod	Mid	Upp
<b>Full Review:</b>															
2014 Southern Non-MSA LA	17	7.02	25.74	0.00	14.53	11.76	16.77	11.76	42.96	76.47	1.21	0.00	1.11	2.58	0.94
<b>Limited Review:</b>															
2014 Alexandria LA MSA	22	9.09	23.62	9.09	16.90	22.73	17.46	27.27	42.01	40.91	1.12	0.00	4.50	1.32	0.60
2014 Baton Rouge LA MSA	29	11.98	23.65	13.79	17.06	20.69	17.30	20.69	41.99	44.83	0.98	1.30	1.07	1.04	0.88
2014 Hammond LA MSA	14	5.79	25.70	7.14	15.56	28.57	17.90	14.29	40.84	50.00	0.95	2.56	1.15	1.32	0.66
2014 Houma-Thibodaux LA MSA	24	9.92	25.31	0.00	15.26	20.83	18.26	12.50	41.16	66.67	1.07	0.00	0.48	0.94	1.37
2014 Lafayette LA MSA	25	10.33	24.12	12.00	15.84	24.00	17.72	24.00	42.32	40.00	1.03	1.65	2.03	1.00	0.69
2014 Lake Charles LA MSA	30	12.40	23.31	6.67	17.53	16.67	17.61	30.00	41.55	46.67	1.49	3.13	4.03	1.90	0.60
2014 Lincoln Parish LA	1	0.41	24.08	0.00	13.42	100.00	17.36	0.00	45.14	0.00	0.34	0.00	3.33	0.00	0.00
2014 Monroe LA MSA	23	9.50	24.06	4.35	15.91	21.74	18.77	13.04	41.26	60.87	0.92	1.75	1.56	0.84	0.77
2014 New Orleans-Metairie LA MSA	34	14.05	23.45	23.53	16.61	17.65	18.53	14.71	41.41	44.12	0.45	1.43	0.50	0.29	0.37
2014 Shreveport-Bossier City LA MSA	23	9.50	22.97	4.35	16.04	30.43	18.55	30.43	42.45	34.78	0.74	0.00	2.62	0.42	0.42

\* Based on 2014 Peer Mortgage Data – US and PR

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

\*\*\* Percentage of Families is based on the 2010 Census information.

\*\*\*\* As a percentage of loans with borrower income information available. No information was available for 0.0% of loans originated and purchased by bank.

27 Data shown includes only One to Four-family and manufactured housing. (Property type of 1 or 2)

**Table 11. Borrower Distribution of Small Loans to Businesses**

Borrower Distribution: SMALL LOANS TO BUSINESSES				Geography: LOUISIANA		Evaluation Period: JANUARY 1, 2014 TO JUNE 30, 2015			
Assessment Area:	Total Small Loans to Businesses		Businesses With Revenues of \$1 million or less		Loans by Original Amount Regardless of Business Size			Market Share	
	#	% of Total**	% of Businesses***	% BANK Loans****	\$100,000 or less	>\$100,000 to \$250,000	>\$250,000 to \$1,000,000	All	Rev\$ 1 Million or Less
<b>Full Review:</b>									
2014 Southern Non-MSA LA	1	1.01	50.12	100.00	100.00	0.00	0.00	0.06	0.19
<b>Limited Review:</b>									
2014 Alexandria LA MSA	10	10.10	57.45	100.00	100.00	0.00	0.00	0.42	0.93
2014 Baton Rouge LA MSA	24	24.24	57.85	83.33	95.83	4.17	0.00	0.26	0.52
2014 Hammond LA MSA	3	3.03	57.67	100.00	100.00	0.00	0.00	0.13	0.32
2014 Houma-Thibodaux LA MSA	0	0.00	54.04	0.00	0.00	0.00	0.00	0.00	0.00
2014 Lafayette LA MSA	4	4.04	57.10	50.00	50.00	50.00	0.00	0.03	0.06
2014 Lake Charles LA MSA	4	4.04	52.86	100.00	100.00	0.00	0.00	0.09	0.23
2014 Lincoln Parish LA	1	1.01	56.82	100.00	100.00	0.00	0.00	0.12	0.23
2014 Monroe LA MSA	7	7.07	58.89	100.00	100.00	0.00	0.00	0.16	0.37
2014 New Orleans-Metairie LA MSA	38	38.38	57.07	97.37	92.11	7.89	0.00	0.13	0.29
2014 Shreveport-Bossier City LA MSA	7	7.07	55.17	100.00	100.00	0.00	0.00	0.13	0.30

\* Based on 2014 Peer Small Business Data – US and PR

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

\*\*\* Businesses with revenues of \$1 million or less as a percentage of all businesses (Source D&B - 2014).

\*\*\*\* Small loans to businesses with revenues of \$1 million or less as a percentage of all loans reported as small loans to businesses. No information was available for 6.06% of small loans to businesses originated and purchased by the bank.

**Table 13. Geographic and Borrower Distribution of Consumer Loans**

Geographic and Borrower Distribution: CONSUMER LOANS																			Geography: LOUISIANA				Evaluation Period: JANUARY 1, 2014 TO JUNE 30, 2015			
Assessment Area:	Geographic Distribution										Borrower Distribution															
	Total Consumer Loans		Low-Income Geographies		Moderate-Income Geographies		Middle-Income Geographies		Upper-Income Geographies		Low-Income Borrowers		Moderate-Income Borrowers		Middle-Income Borrowers		Upper-Income Borrowers									
	#	% of Total'	% of Hhlds**	% of BANK Loans	% of Hhlds**	% of BANK Loans	% of Hhlds**	% of BANK Loans	% of Hhlds**	% of BANK Loans	% of Hhlds**	% of BANK Loans	% of Hhlds**	% of BANK Loans	% of Hhlds**	% of BANK Loans	% of Hhlds**	% of BANK Loans								
<b>Full Review:</b>																										
2014 Southern Non-MSA LA	71	12.96	5.60	0.00	22.28	26.76	33.92	35.21	38.20	38.03	29.57	50.70	13.81	29.58	13.75	9.86	42.87	9.86								
<b>Limited Review:</b>																										
2014 Alexandria LA MSA	21	3.83	7.81	28.57	15.23	28.57	39.21	23.81	37.75	19.05	25.50	52.38	14.77	23.81	17.26	14.29	42.46	9.52								
2014 Baton Rouge LA MSA	36	6.57	15.15	25.00	19.36	52.78	20.09	8.33	45.41	13.89	27.35	52.78	15.30	38.89	17.01	8.33	40.34	0.00								
2014 Hammond LA MSA	27	4.93	0.00	0.00	25.23	96.30	56.66	3.70	18.11	0.00	27.09	37.04	14.02	29.63	15.71	25.93	43.18	7.41								
2014 Houma-Thibodaux LA MSA	26	4.74	0.00	0.00	27.31	38.46	55.31	57.69	17.38	3.85	26.55	57.69	14.96	23.08	16.32	7.69	42.17	11.54								
2014 Lafayette LA MSA	35	6.39	2.89	2.86	23.31	17.14	45.17	68.57	28.63	11.43	26.04	34.29	15.28	31.43	16.15	14.29	42.54	20.00								
2014 Lake Charles LA MSA	34	6.20	7.60	23.53	22.17	44.12	44.67	29.41	25.56	2.94	25.20	73.53	16.32	14.71	15.47	5.88	43.01	5.88								
2014 Lincoln Parish LA	22	4.01	8.05	13.64	27.87	54.55	20.71	22.73	43.37	9.09	28.91	54.55	12.82	31.82	14.07	4.55	44.20	9.09								
2014 Monroe LA MSA	61	11.13	8.02	34.43	22.21	27.87	39.87	18.03	29.90	19.67	27.02	65.57	14.36	18.03	16.27	9.84	42.35	6.56								
2014 New Orleans-Metairie LA MSA	193	35.22	8.15	16.58	22.47	38.34	38.32	33.16	31.07	11.92	25.14	67.36	15.50	19.17	16.99	10.36	42.36	3.11								
2014 Shreveport-Bossier City LA MSA	22	4.01	6.15	22.73	22.22	27.27	38.58	40.91	33.04	9.09	25.06	50.00	15.60	18.18	16.18	22.73	43.16	9.09								

\* Consumer Loans originated and purchased in the MA/AA as a percentage of all consumer loans originated and purchased in the rated area.

\*\* Percentage of households is based on 2010 Census Information.

**Table 14. Qualified Investments**

QUALIFIED INVESTMENTS		Geography: LOUISIANA				Evaluation Period: JUNE 24, 2012 TO JULY 13, 2015			
Assessment Area:	Prior Period Investments*		Current Period Investments		Total Investments			Unfunded Commitments**	
	#	\$(000's)	#	\$(000's)	#	\$(000's)	% of Total	#	\$(000's)
<b>Full Review:</b>									
2014 Southern Non-MSA LA	0	0	5	72	5	72	1.51	0	0
<b>Limited Review:</b>									
2014 Alexandria LA MSA	0	0	1	91	1	91	1.91	0	0
2014 Baton Rouge LA MSA	0	0	7	431	7	431	9.03	0	0
2014 Hammond LA MSA	0	0	2	291	2	291	6.10	0	0
2014 Houma-Thibodaux LA MSA	0	0	2	258	2	258	5.41	0	0
2014 Lafayette LA MSA	0	0	5	816	5	816	17.10	0	0
2014 Lake Charles LA MSA	0	0	2	107	2	107	2.24	0	0
2014 Lincoln Parish LA	0	0	2	5	2	5	0.10	0	0
2014 Monroe LA MSA	0	0	3	82	3	82	1.72	0	0
2014 New Orleans-Metairie LA MSA	1	171	13	2,039	14	2,210	46.32	0	0
2014 Shreveport-Bossier City LA MSA	0	0	4	405	4	405	8.49	0	0

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

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



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

DISTRIBUTION OF BRANCH DELIVERY SYSTEM AND BRANCH OPENINGS/CLOSINGS																Geography: LOUISIANA				Evaluation Period: JANUARY 1, 2014 TO JUNE 30, 2015			
MA/Assessment Area:	Deposits	Branches						Branch Openings/Closings						Population									
	% of Rated Area Deposits in AA	# of BANK Branches	% of Rated Area Branches in AA	Location of Branches by Income of Geographies (%)				# of Branch Openings	# of Branch Closings	Net change in Location of Branches (+ or -)				% of Population within Each Geography									
				Low	Mod	Mid	Upp			Low	Mod	Mid	Upp	Low	Mod	Mid	Upp						
<b>Full Review:</b>																							
2014 Southern Non-MSA LA	10.64	2	10.54	0.00	0.00	50.00	50.00	0	0	0	0	0	0	5.93	21.92	33.09	39.06						
<b>Limited Review:</b>																							
2014 Alexandria LA MSA	6.57	1	5.26	0.00	0.00	0.00	100.00	0	0	0	0	0	0	7.73	15.23	40.83	36.20						
2014 Baton Rouge LA MSA	11.96	2	10.54	0.00	50.00	0.00	50.00	0	0	0	0	0	0	16.95	19.69	19.74	43.62						
2014 Hammond LA MSA	5.26	1	5.26	0.00	100.00	0.00	0.00	0	0	0	0	0	0	0.00	26.54	56.85	16.62						
2014 Houma-Thibodaux LA MSA	4.71	1	5.26	0.00	0.00	100.00	0.00	0	0	0	0	0	0	0.00	27.11	54.30	18.60						
2014 Lafayette LA MSA	6.02	1	5.26	0.00	0.00	0.00	100.00	0	0	0	0	0	0	2.70	23.46	45.22	28.62						
2014 Lake Charles LA MSA	5.91	1	5.26	0.00	100.00	0.00	0.00	0	0	0	0	0	0	7.52	21.66	44.10	26.72						
2014 Lincoln Parish LA	4.38	1	5.26	0.00	0.00	0.00	100.00	0	0	0	0	0	0	8.30	31.98	19.08	40.64						
2014 Monroe LA MSA	7.84	1	5.26	0.00	0.00	0.00	100.00	0	0	0	0	0	0	8.94	24.45	38.18	28.43						
2014 New Orleans-Metairie LA MSA	28.61	6	31.58	0.00	16.67	50.00	33.33	0	0	0	0	0	0	8.53	23.07	38.58	29.55						
2014 Shreveport-Bossier City LA MSA	4.93	1	5.26	0.00	0.00	100.00	0.00	0	0	0	0	0	0	6.94	22.73	37.68	32.65						

## Maryland

Table 1. Lending Volume

LENDING VOLUME		Geography: MARYLAND						Evaluation Period: JANUARY 1, 2014 TO JUNE 30, 2015					
Assessment Area (2014):	% of Rated Area Loans (#) in MA/AA*	Home Mortgage		Small Loans to Businesses		Small Loans to Farms		Community Development Loans**		Total Reported Loans		% of Rated Area Deposits in MA/AA***	
		#	\$ (000's)	#	\$ (000's)	#	\$ (000's)	#	\$ (000's)	#	\$(000's)		
<b>Full Review:</b>													
2014 Salisbury MD MSA	29.52	28	4,713	2	6	0	0	1	35	31	4,754	35.74	
<b>Limited Review:</b>													
2014 Baltimore-Columbia-Towson MD MSA	45.72	32	4,372	14	453	0	0	2	270	48	5,095	60.05	
2014 California-Lexington Park MD MSA	24.76	25	4,759	1	1	0	0	0	0	26	4,760	4.21	

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\* Loan Data as of June 30, 2015. Rated area refers to either state or multistate MA rating area.

\*\* The evaluation period for Community Development Loans is from January 01, 2014 to July 13, 2015.

\*\*\* Deposit Data as of June 30, 2014. Rated Area refers to either the state, multistate MA, or institution, as appropriate.

**Table 1. Other Products**

LENDING VOLUME		Geography: MARYLAND				Evaluation Period: JANUARY 1, 2014 TO JUNE 30, 2015								
Assessment Area (2014):	% of Rated Area Loans (#) in MA/AA:	Total Optional Loans**		Small Business Real Estate Secured**		Home Equity**		Motor Vehicle**		Credit Card**		Other Secured Consumer**		% of Rated Area Deposits in AA***
		#	\$ (000's)	#	\$ (000's)	#	\$ (000's)	#	\$ (000's)	#	\$ (000's)	#	\$ (000's)	
<b>Full Review:</b>														
2014 Salisbury MD MSA	23.58	54	66	0	0	0	0	0	0	0	0	0	0	35.74
<b>Limited Review:</b>														
2014 Baltimore-Columbia-Towson MD MSA	66.81	153	196	0	0	0	0	0	0	0	0	0	0	60.05
2014 California-Lexington Park MD MSA	9.61	22	28	0	0	0	0	0	0	0	0	0	0	4.21

\* Loan Data as of June 30, 2015. Rated area refers to either state or multistate MA rating area.

\*\* The evaluation period for Optional Product Line(s) is from January 01, 2014 to June 30, 2015.

\*\*\* Deposit Data as of June 30, 2014. Rated Area refers to either the state, multistate MA, or institution, as appropriate.

**Table 1. Other Products**

LENDING VOLUME		Geography: MARYLAND		Evaluation Period: JANUARY 1, 2014 TO JUNE 30, 2015	
Assessment Area (2014):	Other Unsecured Consumer Loans*		Other Optional Loans*		
	#	\$ (000's)	#	\$ (000's)	
<b>Full Review:</b>					
2014 Salisbury MD MSA	54	66	0	0	
<b>Limited Review:</b>					
2014 Baltimore-Columbia-Towson MD	153	196	0	0	
2014 California-Lexington Park MD MSA	22	28	0	0	

\* The evaluation period for Optional Product Line(s) is from January 01, 2014 to June 30, 2015.

**Table 3. Geographic Distribution of Home Improvement Loans**

Geographic Distribution: HOME IMPROVEMENT		Geography: MARYLAND						Evaluation Period: JANUARY 1, 2014 TO JUNE 30, 2015							
Assessment Area:	Total Home Improvement Loans		Low-Income Geographies		Moderate-Income Geographies		Middle-Income Geographies		Upper-Income Geographies		Market Share (%) by Geography				
	#	% of Total**	% Owner Occ Units***	% BANK Loans****	% Owner Occ Units***	% BANK Loans	% Owner Occ Units***	% BANK Loans	% Owner Occ Units***	% BANK Loans	Overall	Low	Mod	Mid	Upp
<b>Full Review:</b>															
2014 Salisbury MD	0	0.00	0.10	0.00	12.76	0.00	65.85	0.00	21.28	0.00	0.00	0.00	0.00	0.00	0.00
<b>Limited Review:</b>															
2014 Baltimore-Columbia-Towson MD	5	71.43	5.64	0.00	16.61	40.00	38.99	20.00	38.76	40.00	0.12	0.00	0.33	0.06	0.13
2014 California-Lexington Park MD	2	28.57	3.06	0.00	4.37	0.00	77.53	100.00	15.04	0.00	0.44	0.00	0.00	0.59	0.00

\* Based on 2014 Peer Mortgage Data – US and PR

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

\*\*\* Percentage of Owner Occupied Units is the number of owner occupied units in a particular geography divided by the number of owner occupied housing units in the area based on 2010 Census information.

\*\*\*\* Data shown includes only One to Four-family and manufactured housing. (Property type of 1 or 2)

**Table 4. Geographic Distribution of Home Mortgage Refinance Loans**

Geographic Distribution: HOME MORTGAGE REFINANCE			Geography: MARYLAND						Evaluation Period: JANUARY 1, 2014 TO JUNE 30, 2015						
Assessment Area:	Total Home Mortgage Refinance Loans		Low-Income Geographies		Moderate-Income Geographies		Middle-Income Geographies		Upper-Income Geographies		Market Share (%) by Geography'				
	#	% of Total**	% Owner Occ Units***	% BANK Loans****	% Owner Occ Units***	% BANK Loans	% Owner Occ Units***	% BANK Loans	% Owner Occ Units***	% BANK Loans	Overall	Low	Mod	Mid	Upp
<b>Full Review:</b>															
2014 Salisbury MD MSA	28	36.36	0.10	0.00	12.76	0.00	65.85	78.57	21.28	21.43	0.77	0.00	0.00	0.78	1.11
<b>Limited Review:</b>															
2014 Baltimore-Columbia-Towson MD	27	35.06	5.64	7.41	16.61	25.93	38.99	44.44	38.76	22.22	0.10	0.18	0.18	0.11	0.05
2014 California-Lexington Park MD MSA	22	28.57	3.06	0.00	4.37	4.55	77.53	81.82	15.04	13.64	0.43	0.00	0.00	0.56	0.00

\* Based on 2014 Peer Mortgage Data – US and PR

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

\*\*\* Percentage of Owner Occupied Units is the number of owner occupied units in a particular geography divided by the number of owner occupied housing units in the area based on 2010 Census information.

\*\*\*\* Data shown includes only One to Four-family and manufactured housing. (Property type of 1 or 2)

**Table 6. Geographic Distribution of Small Loans to Businesses**

Geographic Distribution: SMALL LOANS TO BUSINESSES			Geography: MARYLAND						Evaluation Period: JANUARY 1, 2014 TO JUNE 30, 2015						
Assessment Area:	Total Small Business Loans		Low-Income Geographies		Moderate-Income Geographies		Middle-Income Geographies		Upper-Income Geographies		Market Share (%) by Geography				
	#	% of Total**	% of Businesses***	% BANK Loans	% of Businesses***	% BANK Loans	% of Businesses***	% BANK Loans	% of Businesses***	% BANK Loans	Overall	Low	Mod	Mid	Upp
<b>Full Review:</b>															
2014 Salisbury MD	2	11.76	0.71	0.00	16.29	50.00	63.20	50.00	19.62	0.00	0.06	0.00	0.19	0.05	0.00
<b>Limited Review:</b>															
2014 Baltimore-Columbia-Towson	14	82.35	6.93	21.43	14.18	21.43	37.63	28.57	41.04	28.57	0.02	0.11	0.05	0.02	0.00
2014 California-Lexington Park MD	1	5.88	5.28	0.00	6.92	0.00	72.79	0.00	15.01	100.00	0.09	0.00	0.00	0.00	0.56

\* Based on 2014 Peer Small Business Data – US and PR

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

\*\*\* Source Data - Dun and Bradstreet (2014).

**Table 9. Borrower Distribution of Home Improvement Loans**

Borrower Distribution: HOME IMPROVEMENT		Geography: MARYLAND						Evaluation Period: JANUARY 1, 2014 TO JUNE 30, 2015							
Assessment Area:	Total Home Improvement Loans		Low-Income Borrowers		Moderate-Income Borrowers		Middle-Income Borrowers		Upper-Income Borrowers		Market Share <sup>28</sup>				
	#	% of Total <sup>**</sup>	% Families <sup>***</sup>	% BANK Loans <sup>****</sup>	% Families <sup>28</sup>	% BANK Loans <sup>****</sup>	% Families <sup>***</sup>	% BANK Loans <sup>****</sup>	% Families <sup>***</sup>	% BANK Loans <sup>****</sup>	Overall	Low	Mod	Mid	Upp
<b>Full Review:</b>															
2014 Salisbury MD	0	0.00	19.54	0.00	17.95	0.00	21.69	0.00	40.81	0.00	0.00	0.00	0.00	0.00	0.00
<b>Limited Review:</b>															
2014 Baltimore-Columbia-Towson	5	71.43	21.42	20.00	17.32	60.00	20.96	0.00	40.31	20.00	0.13	0.14	0.42	0.00	0.07
2014 California-Lexington Park MD	2	28.57	19.62	0.00	17.60	100.00	23.89	0.00	38.89	0.00	0.45	0.00	4.76	0.00	0.00

\* Based on 2014 Peer Mortgage Data – US and PR

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

\*\*\* Percentage of Families is based on the 2010 Census information.

\*\*\*\* As a percentage of loans with borrower income information available. No information was available for 0.0% of loans originated and purchased by bank.

<sup>28</sup> Data shown includes only One to Four-family and manufactured housing. (Property type of 1 or 2)



**Table 10. Borrower Distribution of Home Mortgage Refinance Loans**

Borrower Distribution: HOME MORTGAGE REFINANCE			Geography: MARYLAND				Evaluation Period: JANUARY 1, 2014 TO JUNE 30, 2015					Market Share <sup>†</sup>				
Assessment Area:	Total Home Mortgage Refinance Loans		Low-Income Borrowers		Moderate-Income Borrowers		Middle-Income Borrowers		Upper-Income Borrowers							
	#	% of Total <sup>**</sup>	% Families <sup>***</sup>	% BANK Loans <sup>****</sup>	% Families <sup>29</sup>	% BANK Loans <sup>****</sup>	% Families <sup>***</sup>	% BANK Loans <sup>****</sup>	% Families <sup>***</sup>	% BANK Loans <sup>****</sup>	Overall	Low	Mod	Mid	Upp	
<b>Full Review:</b>																
2014 Salisbury MD	28	36.36	19.54	3.57	17.95	28.57	21.69	14.29	40.81	53.57	0.95	0.82	1.39	0.99	0.82	
<b>Limited Review:</b>																
2014 Baltimore-Columbia-Towson	27	35.06	21.42	18.52	17.32	29.63	20.96	18.52	40.31	33.33	0.13	0.29	0.18	0.11	0.08	
2014 California-Lexington Park MD	22	28.57	19.62	9.09	17.60	31.82	23.89	18.18	38.89	40.91	0.60	2.27	0.52	0.36	0.45	

\* Based on 2014 Peer Mortgage Data – US and PR

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

\*\*\* Percentage of Families is based on the 2010 Census information.

\*\*\*\* As a percentage of loans with borrower income information available. No information was available for 0.0% of loans originated and purchased by bank.

29 Data shown includes only One to Four-family and manufactured housing. (Property type of 1 or 2)

**Table 11. Borrower Distribution of Small Loans to Businesses**

Borrower Distribution: SMALL LOANS TO BUSINESSES				Geography: MARYLAND		Evaluation Period: JANUARY 1, 2014 TO JUNE 30, 2015			
Assessment Area:	Total Small Loans to Businesses		Businesses With Revenues of \$1 million or less		Loans by Original Amount Regardless of Business Size			Market Share <sup>1</sup>	
	#	% of Total <sup>**</sup>	% of Businesses <sup>***</sup>	% BANK Loans <sup>****</sup>	\$100,000 or less	>\$100,000 to \$250,000	>\$250,000 to \$1,000,000	All	Rev\$ 1 Million or Less
<b>Full Review:</b>									
2014 Salisbury MD MSA	2	11.76	71.01	50.00	100.00	0.00	0.00	0.06	0.07
<b>Limited Review:</b>									
2014 Baltimore-Columbia-Towson MD MSA	14	82.35	70.93	78.57	85.71	14.29	0.00	0.02	0.03
2014 California-Lexington Park MD MSA	1	5.88	70.85	100.00	100.00	0.00	0.00	0.09	0.21

\* Based on 2014 Peer Small Business Data – US and PR

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

\*\*\* Businesses with revenues of \$1 million or less as a percentage of all businesses (Source D&B - 2014).

\*\*\*\* Small loans to businesses with revenues of \$1 million or less as a percentage of all loans reported as small loans to businesses. No information was available for 17.65% of small loans to businesses originated and purchased by the bank.

**Table 13. Geographic and Borrower Distribution of Consumer Loans**

Geographic and Borrower Distribution: CONSUMER LOANS																		Geography: MARYLAND				Evaluation Period: JANUARY 1, 2014 TO JUNE 30, 2015			
Assessment Area:	Geographic Distribution										Borrower Distribution														
	Total Consumer Loans		Low-Income Geographies		Moderate-Income Geographies		Middle-Income Geographies		Upper-Income Geographies		Low-Income Borrowers		Moderate-Income Borrowers		Middle-Income Borrowers		Upper-Income Borrowers								
	#	% of Total	% of Hhlds**	% of BANK Loans	% of Hhlds**	% of BANK Loans	% of Hhlds**	% of BANK Loans	% of Hhlds**	% of BANK Loans	% of Hhlds**	% of BANK Loans	% of Hhlds**	% of BANK Loans	% of Hhlds**	% of BANK Loans	% of Hhlds**	% of BANK Loans							
<b>Full Review:</b>																									
2014 Salisbury MD MSA	54	23.58	0.84	0.00	18.37	33.33	63.05	48.15	17.67	18.52	23.11	62.96	16.72	20.37	18.69	5.56	41.47	11.11							
<b>Limited Review:</b>																									
2014 Baltimore-Columbia-Towson MD	153	66.81	10.42	28.76	21.30	28.76	36.25	26.80	32.02	15.69	24.04	75.16	15.86	17.65	18.30	6.54	41.80	0.65							
2014 California-Lexington Park	22	9.61	5.58	9.09	7.66	27.27	72.29	59.09	14.46	4.55	21.54	90.91	17.01	4.55	22.21	4.55	39.24	0.00							

\* Consumer Loans originated and purchased in the MA/AA as a percentage of all consumer loans originated and purchased in the rated area.  
 \*\* Percentage of households is based on 2010 Census Information.

**Table 14. Qualified Investments**

QUALIFIED INVESTMENTS		Geography: MARYLAND				Evaluation Period: JUNE 24, 2012 TO JULY 13, 2015			
Assessment Area:	Prior Period Investments'		Current Period Investments		Total Investments			Unfunded Commitments''	
	#	\$(000's)	#	\$(000's)	#	\$(000's)	% of Total	#	\$(000's)
<b>Full Review:</b>									
2014 Salisbury MD	0	0	2	330	2	330	17.05	0	0
<b>Limited Review:</b>									
2014 Baltimore-Columbia-Towson MD	2	133	6	835	8	968	50.00	0	0
2014 California-Lexington Park MD	0	0	3	638	3	638	32.95	0	0

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

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

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

DISTRIBUTION OF BRANCH DELIVERY SYSTEM AND BRANCH OPENINGS/CLOSINGS																	Geography: MARYLAND		Evaluation Period: JANUARY 1, 2014 TO JUNE 30, 2015			
MA/Assessment Area:	Deposits	Branches						Branch Openings/Closings						Population								
	% of Rated Area Deposits in AA	# of BANK Branches	% of Rated Area Branches in AA	Location of Branches by Income of Geographies (%)				# of Branch Openings	# of Branch Closings	Net change in Location of Branches (+ or -)				% of Population within Each Geography								
				Low	Mod	Mid	Upp			Low	Mod	Mid	Upp	Low	Mod	Mid	Upp					
<b>Full Review:</b>																						
2014 Salisbury MD	35.74	3	33.33	0.00	33.33	33.34	33.33	0	0	0	0	0	0	0.75	19.20	60.83	17.28					
<b>Limited Review:</b>																						
2014 Baltimore-Columbia-Towson MD	60.05	5	55.57	0.00	0.00	60.00	40.00	0	0	0	0	0	0	10.61	20.58	35.55	32.75					
2014 California-Lexington Park MD	4.21	1	11.11	0.00	0.00	100.00	0.00	0	0	0	0	0	0	4.48	8.23	71.89	15.40					

## Mississippi

**Table 1. Lending Volume**

LENDING VOLUME												
Geography: MISSISSIPPI												
Evaluation Period: JANUARY 1, 2014 TO JUNE 30, 2015												
Assessment Area (2014):	% of Rated Area Loans (#) in MA/AA*	Home Mortgage		Small Loans to Businesses		Small Loans to Farms		Community Development Loans**		Total Reported Loans		% of Rated Area Deposits in MA/AA***
		#	\$ (000's)	#	\$ (000's)	#	\$ (000's)	#	\$ (000's)	#	\$ (000's)	
<b>Full Review:</b>												
2014 Gulfport-Biloxi-Pascagoula MS MSA	27.75	27	3,884	22	48	1	26	3	85	53	4,043	18.69
<b>Limited Review:</b>												
2014 Eastern Non-MSA	15.71	23	2,944	5	8	0	0	2	35	30	2,987	23.96
2014 Jackson MS MSA	15.71	26	2,542	2	66	0	0	2	60	30	2,668	4.83
2014 Lincoln and Pike Counties MS	5.76	5	367	4	11	0	0	2	75	11	453	13.17
2014 Memphis MS MSA	2.09	2	208	1	1	0	0	1	5	4	214	2.63
2014 Northern Non-MSA	18.32	24	3,186	10	30	0	0	1	25	35	3,241	17.36
2014 Warren County MS	3.14	4	493	1	1	0	0	1	5	6	499	4.91
2014 Western Non-MSA	11.52	15	1,932	5	11	0	0	2	60	22	2,003	14.44

\* Loan Data as of June 30, 2015. Rated area refers to either state or multistate MA rating area.

\*\* The evaluation period for Community Development Loans is from January 01, 2014 to July 13, 2015.

\*\*\* Deposit Data as of June 30, 2014. Rated Area refers to either the state, multistate MA, or institution, as appropriate.

**Table 1. Other Products**

LENDING VOLUME		Geography: MISSISSIPPI						Evaluation Period: JANUARY 1, 2014 TO JUNE 30, 2015						
Assessment Area (2014):	% of Rated Area Loans (#) in MA/AA <sup>1</sup>	Total Optional Loans <sup>**</sup>		Small Business Real Estate Secured <sup>**</sup>		Home Equity <sup>**</sup>		Motor Vehicle <sup>**</sup>		Credit Card <sup>**</sup>		Other Secured Consumer <sup>**</sup>		% of Rated Area Deposits in AA <sup>***</sup>
		#	\$ (000's)	#	\$ (000's)	#	\$ (000's)	#	\$ (000's)	#	\$ (000's)	#	\$ (000's)	
<b>Full Review:</b>														
2014 Gulfport-Biloxi-Pascagoula MS MSA	29.50	223	272	0	0	0	0	0	0	0	0	0	0	18.69
<b>Limited Review:</b>														
2014 Eastern Non-MSA	15.48	117	132	0	0	0	0	0	0	0	0	0	0	23.96
2014 Jackson MS MSA	8.33	63	75	0	0	0	0	0	0	0	0	0	0	4.83
2014 Lincoln and Pike Counties MS	10.45	79	108	0	0	0	0	0	0	0	0	0	0	13.17
2014 Memphis MS MSA	2.51	19	29	0	0	0	0	0	0	0	0	0	0	2.63
2014 Northern Non-MSA	18.25	138	166	0	0	0	0	0	0	0	0	0	0	17.36
2014 Warren County MS	3.70	28	38	0	0	0	0	0	0	0	0	0	0	4.91
2014 Western Non-MSA	11.77	89	108	0	0	0	0	0	0	0	0	0	0	14.44

<sup>1</sup> Loan Data as of June 30, 2015. Rated area refers to either state or multistate MA rating area.

<sup>\*\*</sup> The evaluation period for Optional Product Line(s) is from January 01, 2014 to June 30, 2015.

<sup>\*\*\*</sup> Deposit Data as of June 30, 2014. Rated Area refers to either the state, multistate MA, or institution, as appropriate.

**Table 1. Other Products**

LENDING VOLUME		Geography: MISSISSIPPI		Evaluation Period: JANUARY 1, 2014 TO JUNE 30, 2015	
Assessment Area (2014):	Other Unsecured Consumer Loans*		Other Optional Loans*		
	#	\$ (000's)	#	\$ (000's)	
<b>Full Review:</b>					
2014 Gulfport-Biloxi-Pascagoula MS MSA	223	272	0	0	
<b>Limited Review:</b>					
2014 Eastern Non-MSA	117	132	0	0	
2014 Jackson MS MSA	63	75	0	0	
2014 Lincoln and Pike Counties MS	79	108	0	0	
2014 Memphis MS MSA	19	29	0	0	
2014 Northern Non-MSA	138	166	0	0	
2014 Warren County MS	28	38	0	0	
2014 Western Non-MSA	89	108	0	0	

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\* The evaluation period for Optional Product Line(s) is from January 01, 2014 to June 30, 2015.



**Table 4. Geographic Distribution of Home Mortgage Refinance Loans**

Geographic Distribution: HOME MORTGAGE REFINANCE			Geography: MISSISSIPPI						Evaluation Period: JANUARY 1, 2014 TO JUNE 30, 2015						
Assessment Area:	Total Home Mortgage Refinance Loans		Low-Income Geographies		Moderate-Income Geographies		Middle-Income Geographies		Upper-Income Geographies		Market Share (%) by Geography				
	#	% of Total**	% Owner Occ Units***	% BANK Loans****	% Owner Occ Units***	% BANK Loans	% Owner Occ Units***	% BANK Loans	% Owner Occ Units***	% BANK Loans	Overall	Low	Mod	Mid	Upp
<b>Full Review:</b>															
2014 Gulfport-Biloxi-Pascagoula MS MSA	27	21.60	2.13	0.00	12.38	11.11	60.21	59.26	25.28	29.63	0.87	0.00	0.78	0.91	0.88
<b>Limited Review:</b>															
2014 Eastern Non-MSA	23	18.40	3.06	0.00	14.35	8.70	41.83	56.52	40.76	34.78	1.12	0.00	0.51	1.54	0.95
2014 Jackson MS MSA	25	20.00	9.62	0.00	19.70	20.00	49.74	20.00	20.94	60.00	0.84	0.00	1.75	0.21	1.64
2014 Lincoln and Pike Counties MS	5	4.00	3.42	0.00	6.19	20.00	59.53	80.00	30.86	0.00	1.38	0.00	6.25	1.83	0.00
2014 Memphis MS MSA	2	1.60	0.00	0.00	47.39	50.00	52.61	50.00	0.00	0.00	0.72	0.00	0.67	0.79	0.00
2014 Northern Non-MSA	24	19.20	0.00	0.00	3.18	4.17	51.12	37.50	45.70	58.33	1.23	0.00	0.00	1.09	1.38
2014 Warren County MS	4	3.20	0.00	0.00	9.96	0.00	14.38	0.00	75.66	100.00	1.36	0.00	0.00	0.00	1.66
2014 Western Non-MSA	15	12.00	8.74	6.67	49.07	60.00	25.10	13.33	17.09	20.00	0.83	1.25	1.53	0.00	0.42

\* Based on 2014 Peer Mortgage Data – US and PR

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

\*\*\* Percentage of Owner Occupied Units is the number of owner occupied units in a particular geography divided by the number of owner occupied housing units in the area based on 2010 Census information.

\*\*\*\* Data shown includes only One to Four-family and manufactured housing. (Property type of 1 or 2)

**Table 6. Geographic Distribution of Small Loans to Businesses**

Geographic Distribution: SMALL LOANS TO BUSINESSES			Geography: MISSISSIPPI				Evaluation Period: JANUARY 1, 2014 TO JUNE 30, 2015					Market Share (%) by Geography				
Assessment Area:	Total Small Business Loans		Low-Income Geographies		Moderate-Income Geographies		Middle-Income Geographies		Upper-Income Geographies							
	#	% of Total**	% of Businesses***	% BANK Loans	% of Businesses***	% BANK Loans	% of Businesses***	% BANK Loans	% of Businesses***	% BANK Loans	Overall	Low	Mod	Mid	Upp	
<b>Full Review:</b>																
2014 Gulfport-Biloxi-Pascagoula MS MSA	22	44.00	3.36	0.00	19.51	0.00	54.53	63.64	22.54	36.36	0.42	0.00	0.00	0.53	0.55	
<b>Limited Review:</b>																
2014 Eastern Non-MSA MS	5	10.00	4.64	0.00	17.76	80.00	43.49	20.00	34.11	0.00	0.10	0.00	0.47	0.08	0.00	
2014 Jackson MS	2	4.00	19.83	50.00	18.49	50.00	40.49	0.00	21.19	0.00	0.03	0.17	0.00	0.00	0.00	
2014 Lincoln and Pike Counties MS	4	8.00	3.82	25.00	7.08	25.00	61.96	50.00	27.14	0.00	0.31	7.69	1.19	0.20	0.00	
2014 Memphis MS	1	2.00	0.00	0.00	66.37	100.00	33.63	0.00	0.00	0.00	0.51	0.00	0.89	0.00	0.00	
2014 Northern Non-MSA	10	20.00	0.00	0.00	7.89	10.00	48.87	40.00	42.84	50.00	0.19	0.00	0.00	0.13	0.29	
2014 Warren County	1	2.00	0.00	0.00	19.79	0.00	12.45	0.00	67.76	100.00	0.00	0.00	0.00	0.00	0.00	
2014 Western Non-MSA MS	5	10.00	10.66	40.00	48.29	40.00	21.23	0.00	19.83	20.00	0.22	1.18	0.20	0.00	0.23	

\* Based on 2014 Peer Small Business Data – US and PR

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

\*\*\* Source Data - Dun and Bradstreet (2014).

**Table 10. Borrower Distribution of Home Mortgage Refinance Loans**

Borrower Distribution: HOME MORTGAGE REFINANCE			Geography: MISSISSIPPI						Evaluation Period: JANUARY 1, 2014 TO JUNE 30, 2015						
Assessment Area:	Total Home Mortgage Refinance Loans		Low-Income Borrowers		Moderate-Income Borrowers		Middle-Income Borrowers		Upper-Income Borrowers		Market Share <sup>1</sup>				
	#	% of Total <sup>2</sup>	% Families <sup>3</sup>	% BANK Loans <sup>4</sup>	% Families <sup>30</sup>	% BANK Loans <sup>4</sup>	% Families <sup>3</sup>	% BANK Loans <sup>4</sup>	% Families <sup>3</sup>	% BANK Loans <sup>4</sup>	Overall	Low	Mod	Mid	Upp
<b>Full Review:</b>															
2014 Gulfport-Biloxi-Pascagoula	27	21.60	21.82	0.00	17.09	25.93	20.42	14.81	40.67	59.26	1.17	0.00	1.94	1.08	1.18
<b>Limited Review:</b>															
2014 Eastern Non-MSA MS	23	18.40	23.45	4.35	15.26	13.04	15.97	13.04	45.32	69.57	1.41	1.37	1.80	0.75	1.54
2014 Jackson MS MSA	25	20.00	28.25	12.00	17.72	44.00	19.68	12.00	34.35	32.00	1.21	2.36	3.48	0.36	0.49
2014 Lincoln and Pike Counties	5	4.00	22.15	20.00	15.95	40.00	18.28	20.00	43.62	20.00	1.64	5.56	8.57	0.00	0.49
2014 Memphis MS MSA	2	1.60	22.71	0.00	22.61	0.00	20.88	0.00	33.80	100.00	0.83	0.00	0.00	0.00	1.72
2014 Northern Non-MSA MS	24	19.20	18.27	0.00	15.57	12.50	17.26	8.33	48.90	79.17	1.46	0.00	0.62	0.79	1.91
2014 Warren County MS	4	3.20	20.62	0.00	11.93	50.00	13.58	0.00	53.87	50.00	1.61	0.00	6.45	0.00	1.22
2014 Western Non-MSA MS	15	12.00	34.30	6.67	17.46	6.67	15.67	20.00	32.58	66.67	0.98	1.64	1.64	0.00	1.06

\* Based on 2014 Peer Mortgage Data – US and PR

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

\*\*\* Percentage of Families is based on the 2010 Census information.

\*\*\*\* As a percentage of loans with borrower income information available. No information was available for 0.0% of loans originated and purchased by bank.

<sup>30</sup> Data shown includes only One to Four-family and manufactured housing. (Property type of 1 or 2)

**Table 11. Borrower Distribution of Small Loans to Businesses**

Borrower Distribution: SMALL LOANS TO BUSINESSES			Geography: MISSISSIPPI		Evaluation Period: JANUARY 1, 2014 TO JUNE 30, 2015				
Assessment Area:	Total Small Loans to Businesses		Businesses With Revenues of \$1 million or less		Loans by Original Amount Regardless of Business Size			Market Share <sup>1</sup>	
	#	% of Total <sup>2</sup>	% of Businesses <sup>3</sup>	% BANK Loans <sup>4</sup>	\$100,000 or less	>\$100,000 to \$250,000	>\$250,000 to \$1,000,000	All	Rev\$ 1 Million or Less
<b>Full Review:</b>									
2014 Gulfport-Biloxi-Pascagoula	22	44.00	71.94	100.00	100.00	0.00	0.00	0.42	0.83
<b>Limited Review:</b>									
2014 Eastern Non-MSA MS	5	10.00	69.56	100.00	100.00	0.00	0.00	0.10	0.20
2014 Jackson MS MSA	2	4.00	70.35	50.00	100.00	0.00	0.00	0.03	0.00
2014 Lincoln and Pike Counties	4	8.00	70.87	100.00	100.00	0.00	0.00	0.31	0.65
2014 Memphis MS MSA	1	2.00	73.84	100.00	100.00	0.00	0.00	0.51	1.37
2014 Northern Non-MSA MS	10	20.00	69.17	100.00	100.00	0.00	0.00	0.19	0.37
2014 Warren County MS	1	2.00	70.66	100.00	100.00	0.00	0.00	0.00	0.00
2014 Western Non-MSA MS	5	10.00	66.80	100.00	100.00	0.00	0.00	0.22	0.46

\* Based on 2014 Peer Small Business Data – US and PR

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

\*\*\* Businesses with revenues of \$1 million or less as a percentage of all businesses (Source D&B - 2014).

\*\*\*\* Small loans to businesses with revenues of \$1 million or less as a percentage of all loans reported as small loans to businesses. No information was available for 2.00% of small loans to businesses originated and purchased by the bank.

**Table 13. Geographic and Borrower Distribution of Consumer Loans**

Geographic and Borrower Distribution: CONSUMER LOANS																			Geography: MISSISSIPPI				Evaluation Period: JANUARY 1, 2014 TO JUNE 30, 2015			
Assessment Area:	Geographic Distribution										Borrower Distribution															
	Total Consumer Loans		Low-Income Geographies		Moderate-Income Geographies		Middle-Income Geographies		Upper-Income Geographies		Low-Income Borrowers		Moderate-Income Borrowers		Middle-Income Borrowers		Upper-Income Borrowers									
	#	% of Total*	% of Hhlds**	% of BANK Loans	% of Hhlds**	% of BANK Loans	% of Hhlds**	% of BANK Loans	% of Hhlds**	% of BANK Loans	% of Hhlds**	% of BANK Loans	% of Hhlds**	% of BANK Loans	% of Hhlds**	% of BANK Loans	% of Hhlds**	% of BANK Loans								
<b>Full Review:</b>																										
2014 Gulfport-Biloxi-Pascagoula MS MSA	223	29.50	2.57	2.69	15.22	16.59	60.75	67.26	21.45	13.45	23.79	57.40	16.51	22.87	18.06	10.76	41.65	8.97								
<b>Limited Review:</b>																										
2014 Eastern Non-MSA MS	117	15.48	4.85	6.84	16.56	27.35	42.14	38.46	36.45	27.35	26.56	57.26	14.77	21.37	14.28	11.97	44.39	9.40								
2014 Jackson MS	63	8.33	16.02	7.94	22.68	34.92	43.46	53.97	17.84	3.17	29.90	65.08	16.60	26.98	17.59	3.17	35.91	4.76								
2014 Lincoln and Pike Counties MS	79	10.45	6.83	3.80	7.19	17.72	58.13	53.16	27.85	25.32	24.57	35.44	15.42	30.38	14.93	15.19	45.07	18.99								
2014 Memphis MS MSA	19	2.51	0.00	0.00	53.33	68.42	46.67	31.58	0.00	0.00	27.66	52.63	16.73	26.32	19.59	5.26	36.02	15.79								
2014 Northern Non-MSA MS	138	18.25	0.00	0.00	4.73	8.70	50.53	50.72	44.74	40.58	22.90	53.62	13.66	22.46	15.80	16.67	47.64	7.25								
2014 Warren County MS	28	3.70	0.00	0.00	14.61	14.29	15.73	10.71	69.67	75.00	20.92	32.14	14.85	42.86	13.17	21.43	51.06	3.57								
2014 Western Non-MSA MS	89	11.77	11.65	14.61	51.19	44.94	21.41	22.47	15.75	17.98	33.30	48.31	17.07	25.84	15.38	19.10	34.26	6.74								

\* Consumer Loans originated and purchased in the MA/AA as a percentage of all consumer loans originated and purchased in the rated area.  
 \*\* Percentage of households is based on 2010 Census Information.

Table 14. Qualified Investments

QUALIFIED INVESTMENTS		Geography: MISSISSIPPI				Evaluation Period: JUNE 24, 2012 TO JULY 13, 2015			
Assessment Area:	Prior Period Investments*		Current Period Investments		Total Investments			Unfunded Commitments**	
	#	\$(000's)	#	\$(000's)	#	\$(000's)	% of Total	#	\$(000's)
<b>Full Review:</b>									
2014 Gulfport-Biloxi-Pascagoula MS MSA	0	0	3	7	3	7	1.07	0	0
<b>Limited Review:</b>									
2014 Eastern Non-MSA MS	0	0	3	10	3	10	1.53	0	0
2014 Jackson MS MSA	0	0	2	138	2	138	21.07	0	0
2014 Lincoln and Pike Counties MS	0	0	1	49	1	49	7.48	0	0
2014 Memphis MS MSA	0	0	1	110	1	110	16.79	0	0
2014 Northern Non-MSA MS	0	0	2	109	2	109	16.64	0	0
2014 Warren County MS	0	0	2	176	2	176	26.87	0	0
2014 Western Non-MSA MS	0	0	0	0	0	0	0.00	0	0

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

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

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

DISTRIBUTION OF BRANCH DELIVERY SYSTEM AND BRANCH OPENINGS/CLOSINGS																	Geography: MISSISSIPPI				Evaluation Period: JANUARY 1, 2014 TO JUNE 30, 2015			
MA/Assessment Area:	Deposits	Branches						Branch Openings/Closings						Population										
	% of Rated Area Deposits in AA	# of BANK Branches	% of Rated Area Branches in AA	Location of Branches by Income of Geographies (%)				# of Branch Openings	# of Branch Closings	Net change in Location of Branches (+ or -)				% of Population within Each Geography										
				Low	Mod	Mid	Upp			Low	Mod	Mid	Upp	Low	Mod	Mid	Upp							
<b>Full Review:</b>																								
2014 Gulfport-Biloxi-Pascagoula MS MSA	18.69	6	23.10	0.00	33.33	50.00	16.67	0	0	0	0	0	0	2.76	13.90	61.96	21.35							
<b>Limited Review:</b>																								
2014 Eastern Non-MSA	23.96	5	19.23	0.00	0.00	40.00	60.00	0	0	0	0	0	0	4.47	17.15	41.26	37.12							
2014 Jackson MS MSA	4.83	2	7.69	0.00	100.00	0.00	0.00	0	0	0	0	0	0	16.47	23.00	44.68	15.85							
2014 Lincoln and Pike Counties MS	13.17	2	7.69	0.00	0.00	50.00	50.00	0	0	0	0	0	0	7.23	6.71	59.09	26.96							
2014 Memphis MS	2.63	1	3.85	0.00	100.00	0.00	0.00	0	0	0	0	0	0	0.00	57.40	42.60	0.00							
2014 Northern Non-MSA MS	17.36	5	19.23	0.00	20.00	40.00	40.00	1	0	0	0	0	+1	0.00	6.45	49.36	44.19							
2014 Warren County	4.91	1	3.85	0.00	0.00	0.00	100.00	0	0	0	0	0	0	0.00	14.03	15.75	70.22							
2014 Western Non-MSA MS	14.44	4	15.39	0.00	40.00	0.00	50.00	0	0	0	0	0	0	11.43	52.01	22.43	14.13							

## New York

**Table 1. Lending Volume**

LENDING VOLUME		Geography: NEW YORK						Evaluation Period: JANUARY 1, 2014 TO JUNE 30, 2015				
Assessment Area (2014):	% of Rated Area Loans (#) in MA/AA*	Home Mortgage		Small Loans to Businesses		Small Loans to Farms		Community Development Loans**		Total Reported Loans		% of Rated Area Deposits in MA/AA***
		#	\$ (000's)	#	\$ (000's)	#	\$ (000's)	#	\$ (000's)	#	\$(000's)	
<b>Full Review:</b>												
2014 Utica-Rome NY	13.12	23	2,394	5	98	0	0	1	50	29	2,542	19.06
<b>Limited Review:</b>												
2014 Albany-Schenectady-Troy NY MSA	14.03	25	3,319	5	16	0	0	1	25	31	3,360	10.20
2014 Buffalo-Cheektowaga-Niagara Falls NY MSA	21.27	36	2,908	10	64	0	0	1	75	47	3,047	13.41
2014 Elmira NY MSA	0.90	1	95	0	0	0	0	1	10	2	105	10.56
2014 Rochester NY MSA	19.46	23	2,195	19	78	0	0	1	75	43	2,348	16.62
2014 Syracuse NY MSA	11.31	23	2,156	1	3	0	0	1	75	25	2,234	2.92
2014 Watertown-Fort Drum NY MSA	2.72	3	197	3	8	0	0	0	0	6	205	7.12
2014 Western Non-MSA	17.19	24	2,415	12	21	0	0	2	65	38	2,501	20.11

\* Loan Data as of June 30, 2015. Rated area refers to either state or multistate MA rating area.

\*\* The evaluation period for Community Development Loans is from January 01, 2014 to July 13, 2015.

\*\*\* Deposit Data as of June 30, 2014. Rated Area refers to either the state, multistate MA, or institution, as appropriate.



**Table 1. Other Products**

LENDING VOLUME		Geography: NEW YORK						Evaluation Period: JANUARY 1, 2014 TO JUNE 30, 2015						
Assessment Area (2014):	% of Rated Area Loans (#) in MA/AA'	Total Optional Loans**		Small Business Real Estate Secured**		Home Equity**		Motor Vehicle**		Credit Card**		Other Secured Consumer**		% of Rated Area Deposits in AA***
		#	\$ (000's)	#	\$ (000's)	#	\$ (000's)	#	\$ (000's)	#	\$ (000's)	#	\$ (000's)	
<b>Full Review:</b>														
2014 Utica-Rome NY	11.80	88	124	0	0	0	0	0	0	0	0	0	0	19.06
<b>Limited Review:</b>														
2014 Albany-Schenectady-Troy NY MSA	9.52	71	91	0	0	0	0	0	0	0	0	0	0	10.20
2014 Buffalo-Cheektowaga-Niagara Falls NY MSA	19.97	149	227	0	0	0	0	0	0	0	0	0	0	13.41
2014 Elmira NY MSA	3.62	27	38	0	0	0	0	0	0	0	0	0	0	10.56
2014 Rochester NY MSA	29.62	221	287	0	0	0	0	0	0	0	0	0	0	16.62
2014 Syracuse NY MSA	3.89	29	35	0	0	0	0	0	0	0	0	0	0	2.92
2014 Watertown-Fort Drum NY MSA	4.96	37	60	0	0	0	0	0	0	0	0	0	0	7.12
2014 Western Non-MSA	16.62	124	179	0	0	0	0	0	0	0	0	0	0	20.11

\* Loan Data as of June 30, 2015. Rated area refers to either state or multistate MA rating area.

\*\* The evaluation period for Optional Product Line(s) is from January 01, 2014 to June 30, 2015.

\*\*\* Deposit Data as of June 30, 2014. Rated Area refers to either the state, multistate MA, or institution, as appropriate.

**Table 1. Other Products**

LENDING VOLUME		Geography: NEW YORK		Evaluation Period: JANUARY 1, 2014 TO JUNE 30, 2015	
Assessment Area (2014):	Other Unsecured Consumer Loans*		Other Optional Loans*		
	#	\$ (000's)	#	\$ (000's)	
<b>Full Review:</b>					
2014 Utica-Rome NY MSA	88	124	0	0	
<b>Limited Review:</b>					
2014 Albany-Schenectady-Troy NY MSA	71	91	0	0	
2014 Buffalo-Cheektowaga-Niagara Falls NY MSA	149	227	0	0	
2014 Elmira NY MSA	27	38	0	0	
2014 Rochester NY MSA	221	287	0	0	
2014 Syracuse NY MSA	29	35	0	0	
2014 Watertown-Fort Drum NY MSA	37	60	0	0	
2014 Western Non-MSA NY	124	179	0	0	

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\* The evaluation period for Optional Product Line(s) is from January 01, 2014 to June 30, 2015.

**Table 2. Geographic Distribution of Home Purchase Loans**

Geographic Distribution: HOME PURCHASE			Geography: NEW YORK				Evaluation Period: JANUARY 1, 2014 TO JUNE 30, 2015					Market Share (%) by Geography				
Assessment Area:	Total Home Purchase Loans		Low-Income Geographies		Moderate-Income Geographies		Middle-Income Geographies		Upper-Income Geographies		Overall	Low	Mod	Mid	Upp	
	#	% of Total**	% Owner Occ Units***	% BANK Loans****	% Owner Occ Units***	% BANK Loans	% Owner Occ Units***	% BANK Loans	% Owner Occ Units***	% BANK Loans						
<b>Full Review:</b>																
2014 Utica-Rome NY	0	0.00	2.90	0.00	8.83	0.00	60.03	0.00	28.24	0.00	0.00	0.00	0.00	0.00	0.00	
<b>Limited Review:</b>																
2014 Albany-Schenectady-Troy NY	0	0.00	6.65	0.00	8.70	0.00	46.51	0.00	38.14	0.00	0.00	0.00	0.00	0.00	0.00	
2014 Buffalo-Cheektowaga-Niagara Falls NY MSA	0	0.00	5.03	0.00	14.25	0.00	43.06	0.00	37.67	0.00	0.00	0.00	0.00	0.00	0.00	
2014 Elmira NY MSA	0	0.00	2.80	0.00	23.34	0.00	41.25	0.00	32.61	0.00	0.00	0.00	0.00	0.00	0.00	
2014 Rochester NY MSA	0	0.00	3.16	0.00	10.89	0.00	56.00	0.00	29.95	0.00	0.00	0.00	0.00	0.00	0.00	
2014 Syracuse NY MSA	0	0.00	3.25	0.00	13.57	0.00	49.17	0.00	34.01	0.00	0.00	0.00	0.00	0.00	0.00	
2014 Watertown-Fort Drum NY MSA	0	0.00	0.00	0.00	9.18	0.00	69.59	0.00	21.23	0.00	0.00	0.00	0.00	0.00	0.00	
2014 Western Non-MSA	0	0.00	0.21	0.00	10.17	0.00	79.91	0.00	9.71	0.00	0.00	0.00	0.00	0.00	0.00	

\* Based on 2014 Peer Mortgage Data – US and PR

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

\*\*\* Percentage of Owner Occupied Units is the number of owner occupied units in a particular geography divided by the number of owner occupied housing units in the area based on 2010 Census information.

\*\*\*\* Data shown includes only One to Four-family and manufactured housing. (Property type of 1 or 2)

**Table 3. Geographic Distribution of Home Improvement Loans**

Geographic Distribution: HOME IMPROVEMENT			Geography: NEW YORK				Evaluation Period: JANUARY 1, 2014 TO JUNE 30, 2015					Market Share (%) by Geography				
Assessment Area:	Total Home Improvement Loans		Low-Income Geographies		Moderate-Income Geographies		Middle-Income Geographies		Upper-Income Geographies		Overall	Low	Mod	Mid	Upp	
	#	% of Total**	% Owner Occ Units***	% BANK Loans****	% Owner Occ Units***	% BANK Loans	% Owner Occ Units***	% BANK Loans	% Owner Occ Units***	% BANK Loans						
<b>Full Review:</b>																
2014 Utica-Rome NY	1	16.67	2.90	0.00	8.83	0.00	60.03	100.00	28.24	0.00	0.00	0.00	0.00	0.00	0.00	
<b>Limited Review:</b>																
2014 Albany-Schenectady-Troy NY	1	16.67	6.65	0.00	8.70	100.00	46.51	0.00	38.14	0.00	0.16	0.00	2.94	0.00	0.00	
2014 Buffalo-Cheektowaga-Niagara Falls NY MSA	2	33.33	5.03	50.00	14.25	0.00	43.06	50.00	37.67	0.00	0.10	0.79	0.00	0.11	0.00	
2014 Elmira NY MSA	0	0.00	2.80	0.00	23.34	0.00	41.25	0.00	32.61	0.00	0.00	0.00	0.00	0.00	0.00	
2014 Rochester NY	2	33.33	3.16	0.00	10.89	0.00	56.00	100.00	29.95	0.00	0.06	0.00	0.00	0.10	0.00	
2014 Syracuse NY	0	0.00	3.25	0.00	13.57	0.00	49.17	0.00	34.01	0.00	0.00	0.00	0.00	0.00	0.00	
2014 Watertown-Fort Drum NY MSA	0	0.00	0.00	0.00	9.18	0.00	69.59	0.00	21.23	0.00	0.00	0.00	0.00	0.00	0.00	
2014 Western Non-MSA NY	0	0.00	0.21	0.00	10.17	0.00	79.91	0.00	9.71	0.00	0.00	0.00	0.00	0.00	0.00	

\* Based on 2014 Peer Mortgage Data – US and PR

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

\*\*\* Percentage of Owner Occupied Units is the number of owner occupied units in a particular geography divided by the number of owner occupied housing units in the area based on 2010 Census information.

\*\*\*\* Data shown includes only One to Four-family and manufactured housing. (Property type of 1 or 2)

**Table 4. Geographic Distribution of Home Mortgage Refinance Loans**

Geographic Distribution: HOME MORTGAGE REFINANCE			Geography: NEW YORK						Evaluation Period: JANUARY 1, 2014 TO JUNE 30, 2015						
Assessment Area:	Total Home Mortgage Refinance Loans		Low-Income Geographies		Moderate-Income Geographies		Middle-Income Geographies		Upper-Income Geographies		Market Share (%) by Geography <sup>1</sup>				
	#	% of Total <sup>2</sup>	% Owner Occ Units <sup>3</sup>	% BANK Loans <sup>4</sup>	% Owner Occ Units <sup>3</sup>	% BANK Loans	% Owner Occ Units <sup>3</sup>	% BANK Loans	% Owner Occ Units <sup>3</sup>	% BANK Loans	Overall	Low	Mod	Mid	Upp
<b>Full Review:</b>															
2014 Utica-Rome NY	22	14.47	2.90	0.00	8.83	4.55	60.03	59.09	28.24	36.36	0.46	0.00	0.79	0.29	0.72
<b>Limited Review:</b>															
2014 Albany-Schenectady-Troy NY	24	15.79	6.65	4.17	8.70	12.50	46.51	37.50	38.14	45.83	0.75	0.00	0.94	0.61	0.99
2014 Buffalo-Cheektowaga-Niagara Falls NY MSA	34	22.37	5.03	2.94	14.25	20.59	43.06	47.06	37.67	29.41	0.67	1.10	1.14	0.72	0.47
2014 Elmira NY MSA	1	0.66	2.80	0.00	23.34	0.00	41.25	100.00	32.61	0.00	0.19	0.00	0.00	0.43	0.00
2014 Rochester NY	21	13.82	3.16	0.00	10.89	14.29	56.00	57.14	29.95	28.57	0.36	0.00	0.56	0.37	0.32
2014 Syracuse NY	23	15.13	3.25	4.35	13.57	17.39	49.17	43.48	34.01	34.78	0.50	1.54	0.73	0.41	0.49
2014 Watertown-Fort Drum NY MSA	3	1.97	0.00	0.00	9.18	33.33	69.59	66.67	21.23	0.00	0.47	0.00	1.69	0.46	0.00
2014 Western Non-MSA NY	24	15.79	0.21	0.00	10.17	8.33	79.91	79.17	9.71	12.50	1.54	0.00	1.18	1.59	1.37

<sup>1</sup> \* Based on 2014 Peer Mortgage Data – US and PR

<sup>2</sup> \*\* Home refinance loans originated and purchased in the MA/AA as a percentage of all home refinance loans originated and purchased in the rated area.

<sup>3</sup> \*\*\* Percentage of Owner Occupied Units is the number of owner occupied units in a particular geography divided by the number of owner occupied housing units in the area based on 2010 Census information.

<sup>4</sup> \*\*\*\* Data shown includes only One to Four-family and manufactured housing. (Property type of 1 or 2)

**Table 5. Geographic Distribution of Multifamily Loans**

Geographic Distribution: MULTIFAMILY			Geography: NEW YORK				Evaluation Period: JANUARY 1, 2014 TO JUNE 30, 2015					Market Share (%) by Geography <sup>1</sup>				
Assessment Area:	Total Multifamily Loans		Low-Income Geographies		Moderate-Income Geographies		Middle-Income Geographies		Upper-Income Geographies		Overall	Low	Mod	Mid	Upp	
	#	% of Total <sup>**</sup>	% of MF Units <sup>***</sup>	% BANK Loans <sup>****</sup>	% MF Units <sup>***</sup>	% BANK Loans	% MF Units <sup>***</sup>	% BANK Loans	% MF Units <sup>***</sup>	% BANK Loans						
<b>Full Review:</b>																
2014 Utica-Rome NY	0	0.00	15.96	0.00	27.21	0.00	39.87	0.00	16.96	0.00	0.00	0.00	0.00	0.00	0.00	
<b>Limited Review:</b>																
2014 Albany-Schenectady-Troy NY	0	0.00	17.64	0.00	22.25	0.00	27.27	0.00	32.85	0.00	0.00	0.00	0.00	0.00	0.00	
2014 Buffalo-Cheektowaga-Niagara Falls NY MSA	0	0.00	19.63	0.00	16.67	0.00	37.14	0.00	26.56	0.00	0.00	0.00	0.00	0.00	0.00	
2014 Elmira NY MSA	0	0.00	23.80	0.00	32.77	0.00	28.14	0.00	15.29	0.00	0.00	0.00	0.00	0.00	0.00	
2014 Rochester NY	0	0.00	17.67	0.00	14.07	0.00	48.51	0.00	19.76	0.00	0.00	0.00	0.00	0.00	0.00	
2014 Syracuse NY	0	0.00	24.54	0.00	25.39	0.00	31.05	0.00	19.02	0.00	0.00	0.00	0.00	0.00	0.00	
2014 Watertown-Fort Drum NY MSA	0	0.00	0.00	0.00	41.96	0.00	48.54	0.00	9.50	0.00	0.00	0.00	0.00	0.00	0.00	
2014 Western Non-MSA NY	0	0.00	6.28	0.00	21.33	0.00	64.36	0.00	8.03	0.00	0.00	0.00	0.00	0.00	0.00	

\* Based on 2014 Peer Mortgage Data --- US and PR

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

\*\*\* Percentage of multifamily Units is the number of multifamily units in a particular geography divided by the number of multifamily housing units in the area based on 2010 Census information.

\*\*\*\* Multifamily loan distribution includes Home Purchases, Home Improvement and Refinances.

**Table 6. Geographic Distribution of Small Loans to Businesses**

Geographic Distribution: SMALL LOANS TO BUSINESSES			Geography: NEW YORK						Evaluation Period: JANUARY 1, 2014 TO JUNE 30, 2015						
Assessment Area:	Total Small Business Loans		Low-Income Geographies		Moderate-Income Geographies		Middle-Income Geographies		Upper-Income Geographies		Market Share (%) by Geography				
	#	% of Total**	% of Businesses***	% BANK Loans	% of Businesses***	% BANK Loans	% of Businesses***	% BANK Loans	% of Businesses***	% BANK Loans	Overall	Low	Mod	Mid	Upp
<b>Full Review:</b>															
2014 Utica-Rome NY	5	9.09	4.53	0.00	13.47	0.00	55.14	60.00	25.47	40.00	0.06	0.00	0.00	0.06	0.10
<b>Limited Review:</b>															
2014 Albany-Schenectady-Troy NY	5	9.09	11.46	0.00	17.43	40.00	38.28	20.00	32.83	40.00	0.08	0.00	0.23	0.04	0.08
2014 Buffalo-Cheektowaga-Niagara Falls NY MSA	10	18.18	8.01	0.00	14.74	30.00	40.93	50.00	35.91	20.00	0.06	0.00	0.15	0.07	0.03
2014 Elmira NY MSA	0	0.00	15.24	0.00	23.42	0.00	31.26	0.00	30.03	0.00	0.00	0.00	0.00	0.00	0.00
2014 Rochester NY	19	34.55	9.52	21.05	11.19	21.05	49.69	57.89	29.39	0.00	0.09	0.16	0.29	0.10	0.00
2014 Syracuse NY	1	1.82	13.22	0.00	14.19	0.00	43.58	100.00	28.99	0.00	0.01	0.00	0.00	0.03	0.00
2014 Watertown-Fort Drum NY MSA	3	5.45	0.00	0.00	15.76	0.00	61.22	100.00	23.00	0.00	0.07	0.00	0.00	0.12	0.00
2014 Western Non-MSA	12	21.82	2.59	0.00	13.48	8.33	75.18	91.67	8.70	0.00	0.10	0.00	0.00	0.14	0.00

\* Based on 2014 Peer Small Business Data – US and PR

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

\*\*\* Source Data - Dun and Bradstreet (2014).

**Table 7. Geographic Distribution of Small Loans to Farms**

Geographic Distribution: SMALL LOANS TO FARMS			Geography: NEW YORK						Evaluation Period: JANUARY 1, 2014 TO JUNE 30, 2015						
Assessment Area:	Total Small Farm Loans		Low-Income Geographies		Moderate-Income Geographies		Middle-Income Geographies		Upper-Income Geographies		Market Share (%) by Geography				
	#	% of Total**	% of Farms***	% BANK Loans	% of Farms***	% BANK Loans	% of Farms***	% BANK Loans	% of Farms***	% BANK Loans	Overall	Low	Mod	Mid	Upp
<b>Full Review:</b>															
2014 Utica-Rome NY	0	0.00	0.89	0.00	2.12	0.00	78.66	0.00	18.32	0.00	0.00	0.00	0.00	0.00	0.00
<b>Limited Review:</b>															
2014 Albany-Schenectady-Troy NY	0	0.00	3.15	0.00	5.58	0.00	55.36	0.00	35.91	0.00	0.00	0.00	0.00	0.00	0.00
2014 Buffalo-Cheektowaga-Niagara Falls NY MSA	0	0.00	2.40	0.00	5.60	0.00	51.28	0.00	40.72	0.00	0.00	0.00	0.00	0.00	0.00
2014 Elmira NY MSA	0	0.00	4.28	0.00	15.51	0.00	48.13	0.00	32.09	0.00	0.00	0.00	0.00	0.00	0.00
2014 Rochester NY	0	0.00	1.71	0.00	9.03	0.00	65.79	0.00	23.47	0.00	0.00	0.00	0.00	0.00	0.00
2014 Syracuse NY	0	0.00	1.90	0.00	8.86	0.00	59.25	0.00	29.99	0.00	0.00	0.00	0.00	0.00	0.00
2014 Watertown-Fort Drum NY MSA	0	0.00	0.00	0.00	3.05	0.00	76.03	0.00	20.92	0.00	0.00	0.00	0.00	0.00	0.00
2014 Western Non-MSA	0	0.00	0.00	0.00	6.44	0.00	80.74	0.00	12.82	0.00	0.00	0.00	0.00	0.00	0.00

\* Based on 2014 Peer Small Business Data – US and PR

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

\*\*\* Source Data - Dun and Bradstreet (2014).



**Table 8. Borrower Distribution of Home Purchase Loans**

Borrower Distribution: HOME PURCHASE			Geography: NEW YORK				Evaluation Period: JANUARY 1, 2014 TO JUNE 30, 2015					Market Share <sup>1</sup>				
Assessment Area:	Total Home Purchase Loans		Low-Income Borrowers		Moderate-Income Borrowers		Middle-Income Borrowers		Upper-Income Borrowers		Overall	Low	Mod	Mid	Upp	
	#	% of Total <sup>**</sup>	% Families <sup>***</sup>	% BANK Loans <sup>****</sup>	% Families <sup>31</sup>	% BANK Loans <sup>****</sup>	% Families <sup>***</sup>	% BANK Loans <sup>****</sup>	% Families <sup>***</sup>	% BANK Loans <sup>****</sup>						
<b>Full Review:</b>																
2014 Utica-Rome NY MSA	0	0.00	21.06	0.00	17.28	0.00	21.41	0.00	40.26	0.00	0.00	0.00	0.00	0.00	0.00	
<b>Limited Review:</b>																
2014 Albany-Schenectady-Troy NY MSA	0	0.00	21.74	0.00	17.26	0.00	21.28	0.00	39.72	0.00	0.00	0.00	0.00	0.00	0.00	
2014 Buffalo-Cheektowaga-Niagara Falls NY MSA	0	0.00	21.62	0.00	17.44	0.00	20.85	0.00	40.08	0.00	0.00	0.00	0.00	0.00	0.00	
2014 Elmira NY MSA	0	0.00	22.12	0.00	16.55	0.00	21.19	0.00	40.14	0.00	0.00	0.00	0.00	0.00	0.00	
2014 Rochester NY MSA	0	0.00	20.30	0.00	17.31	0.00	22.06	0.00	40.33	0.00	0.00	0.00	0.00	0.00	0.00	
2014 Syracuse NY MSA	0	0.00	21.35	0.00	17.13	0.00	21.49	0.00	40.04	0.00	0.00	0.00	0.00	0.00	0.00	
2014 Watertown-Fort Drum NY MSA	0	0.00	20.80	0.00	18.04	0.00	21.95	0.00	39.21	0.00	0.00	0.00	0.00	0.00	0.00	
2014 Western Non-MSA NY	0	0.00	20.62	0.00	18.10	0.00	23.06	0.00	38.22	0.00	0.00	0.00	0.00	0.00	0.00	

\* Based on 2014 Peer Mortgage Data – US and PR

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

\*\*\* Percentage of Families is based on the 2010 Census information.

\*\*\*\* As a percentage of loans with borrower income information available. No information was available for 0.0% of loans originated and purchased by bank.

31 Data shown includes only One to Four-family and manufactured housing. (Property type of 1 or 2)

**Table 9. Borrower Distribution of Home Improvement Loans**

Borrower Distribution: HOME IMPROVEMENT															Geography: NEW YORK					Evaluation Period: JANUARY 1, 2014 TO JUNE 30, 2015				
Assessment Area:	Total Home Improvement Loans		Low-Income Borrowers		Moderate-Income Borrowers		Middle-Income Borrowers		Upper-Income Borrowers		Market Share <sup>†</sup>													
	#	% of Total <sup>**</sup>	% Families <sup>***</sup>	% BANK Loans <sup>****</sup>	% Families <sup>32</sup>	% BANK Loans <sup>****</sup>	% Families <sup>***</sup>	% BANK Loans <sup>****</sup>	% Families <sup>***</sup>	% BANK Loans <sup>****</sup>	Overall	Low	Mod	Mid	Upp									
<b>Full Review:</b>																								
2014 Utica-Rome NY	1	16.67	21.06	0.00	17.28	0.00	21.41	0.00	40.26	100.00	0.00	0.00	0.00	0.00	0.00									
<b>Limited Review:</b>																								
2014 Albany-Schenectady-Troy NY	1	16.67	21.74	100.00	17.26	0.00	21.28	0.00	39.72	0.00	0.18	1.89	0.00	0.00	0.00									
2014 Buffalo-Cheektowaga-Niagara Falls NY MSA	2	33.33	21.62	50.00	17.44	0.00	20.85	50.00	40.08	0.00	0.11	0.39	0.00	0.23	0.00									
2014 Elmira NY MSA	0	0.00	22.12	0.00	16.55	0.00	21.19	0.00	40.14	0.00	0.00	0.00	0.00	0.00	0.00									
2014 Rochester NY	2	33.33	20.30	0.00	17.31	0.00	22.06	100.00	40.33	0.00	0.06	0.00	0.00	0.22	0.00									
2014 Syracuse NY MSA	0	0.00	21.35	0.00	17.13	0.00	21.49	0.00	40.04	0.00	0.00	0.00	0.00	0.00	0.00									
2014 Watertown-Fort Drum NY MSA	0	0.00	20.80	0.00	18.04	0.00	21.95	0.00	39.21	0.00	0.00	0.00	0.00	0.00	0.00									
2014 Western Non-MSA NY	0	0.00	20.62	0.00	18.10	0.00	23.06	0.00	38.22	0.00	0.00	0.00	0.00	0.00	0.00									

\* Based on 2014 Peer Mortgage Data – US and PR

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

\*\*\* Percentage of Families is based on the 2010 Census information.

\*\*\*\* As a percentage of loans with borrower income information available. No information was available for 0.0% of loans originated and purchased by bank.

32 Data shown includes only One to Four-family and manufactured housing. (Property type of 1 or 2)

**Table 10. Borrower Distribution of Home Mortgage Refinance Loans**

Borrower Distribution: HOME MORTGAGE REFINANCE			Geography: NEW YORK						Evaluation Period: JANUARY 1, 2014 TO JUNE 30, 2015							
Assessment Area:	Total Home Mortgage Refinance Loans		Low-Income Borrowers		Moderate-Income Borrowers		Middle-Income Borrowers		Upper-Income Borrowers		Market Share <sup>†</sup>					
	#	% of Total <sup>**</sup>	% Families <sup>***</sup>	% BANK Loans <sup>****</sup>	% Families <sup>33</sup>	% BANK Loans <sup>****</sup>	% Families <sup>***</sup>	% BANK Loans <sup>****</sup>	% Families <sup>***</sup>	% BANK Loans <sup>****</sup>	% Families <sup>***</sup>	% BANK Loans <sup>****</sup>	Overall	Low	Mod	Mid
<b>Full Review:</b>																
2014 Utica-Rome NY MSA	22	14.47	21.06	4.55	17.28	18.18	21.41	31.82	40.26	45.45	0.49	0.00	1.12	0.45	0.28	
<b>Limited Review:</b>																
2014 Albany-Schenectady-Troy NY MSA	24	15.79	21.74	12.50	17.26	29.17	21.28	20.83	39.72	37.50	0.90	1.43	1.50	0.47	0.78	
2014 Buffalo-Cheektowaga-Niagara Falls NY MSA	34	22.37	21.62	17.65	17.44	29.41	20.85	29.41	40.08	23.53	0.80	1.86	1.02	0.86	0.45	
2014 Elmira NY MSA	1	0.66	22.12	0.00	16.55	0.00	21.19	100.00	40.14	0.00	0.20	0.00	1.00	0.00	0.00	
2014 Rochester NY MSA	21	13.82	20.30	23.81	17.31	23.81	22.06	23.81	40.33	28.57	0.41	1.11	0.45	0.37	0.28	
2014 Syracuse NY MSA	23	15.13	21.35	21.74	17.13	30.43	21.49	21.74	40.04	26.09	0.57	1.73	0.74	0.36	0.34	
2014 Watertown-Fort Drum NY MSA	3	1.97	20.80	0.00	18.04	33.33	21.95	33.33	39.21	33.33	0.59	0.00	1.20	0.90	0.34	
2014 Western Non-MSA NY	24	15.79	20.62	8.33	18.10	12.50	23.06	20.83	38.22	58.33	1.74	0.00	1.49	0.98	2.66	

\* Based on 2014 Peer Mortgage Data – US and PR

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

\*\*\* Percentage of Families is based on the 2010 Census information.

\*\*\*\* As a percentage of loans with borrower income information available. No information was available for 0.0% of loans originated and purchased by bank.

33 Data shown includes only One to Four-family and manufactured housing. (Property type of 1 or 2)

**Table 11. Borrower Distribution of Small Loans to Businesses**

Borrower Distribution: SMALL LOANS TO BUSINESSES		Geography: NEW YORK			Evaluation Period: JANUARY 1, 2014 TO JUNE 30, 2015				
Assessment Area:	Total Small Loans to Businesses		Businesses With Revenues of \$1 million or less		Loans by Original Amount Regardless of Business Size			Market Share <sup>1</sup>	
	#	% of Total <sup>**</sup>	% of Businesses <sup>***</sup>	% BANK Loans <sup>****</sup>	\$100,000 or less	>\$100,000 to \$250,000	>\$250,000 to \$1,000,000	All	Rev\$ 1 Million or Less
<b>Full Review:</b>									
2014 Utica-Rome NY MSA	5	9.09	71.48	80.00	100.00	0.00	0.00	0.00	0.00
<b>Limited Review:</b>									
2014 Albany-Schenectady-Troy NY MSA	5	9.09	68.25	100.00	100.00	0.00	0.00	0.08	0.20
2014 Buffalo-Cheektowaga-Niagara Falls NY MSA	10	18.18	69.81	100.00	100.00	0.00	0.00	0.06	0.15
2014 Elmira NY MSA	0	0.00	69.04	0.00	0.00	0.00	0.00	0.00	0.00
2014 Rochester NY MSA	19	34.55	71.33	94.74	100.00	0.00	0.00	0.09	0.23
2014 Syracuse NY MSA	1	1.82	71.56	100.00	100.00	0.00	0.00	0.01	0.03
2014 Watertown-Fort Drum NY MSA	3	5.45	68.82	100.00	100.00	0.00	0.00	0.07	0.17
2014 Western Non-MSA NY	12	21.82	69.30	100.00	100.00	0.00	0.00	0.10	0.22

\* Based on 2014 Peer Small Business Data – US and PR

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

\*\*\* Businesses with revenues of \$1 million or less as a percentage of all businesses (Source D&B - 2014).

\*\*\*\* Small loans to businesses with revenues of \$1 million or less as a percentage of all loans reported as small loans to businesses. No information was available for 3.64% of small loans to businesses originated and purchased by the bank.

**Table 13. Geographic and Borrower Distribution of Consumer Loans**

Geographic and Borrower Distribution: CONSUMER LOANS																		Geography: NEW YORK				Evaluation Period: JANUARY 1, 2014 TO JUNE 30, 2015			
Assessment Area:	Geographic Distribution										Borrower Distribution														
	Total Consumer Loans		Low-Income Geographies		Moderate-Income Geographies		Middle-Income Geographies		Upper-Income Geographies		Low-Income Borrowers		Moderate-Income Borrowers		Middle-Income Borrowers		Upper-Income Borrowers								
	#	% of Total	% of Hhlds**	% of BANK Loans	% of Hhlds**	% of BANK Loans	% of Hhlds**	% of BANK Loans	% of Hhlds**	% of BANK Loans	% of Hhlds**	% of BANK Loans	% of Hhlds**	% of BANK Loans	% of Hhlds**	% of BANK Loans	% of Hhlds**	% of BANK Loans							
<b>Full Review:</b>																									
2014 Utica-Rome	88	11.80	6.79	2.27	14.55	23.86	54.76	65.91	23.84	7.95	24.62	63.64	16.18	19.32	17.82	14.77	41.38	2.27							
<b>Limited Review:</b>																									
2014 Albany-Schenectady-Troy	71	9.52	12.99	35.21	13.92	33.80	40.25	18.31	32.84	12.68	25.46	85.92	16.47	8.45	17.71	4.23	40.37	1.41							
2014 Buffalo-Cheektowaga-Niagara Falls NY	149	19.97	9.99	9.40	18.35	17.45	40.39	40.94	31.28	32.21	25.18	60.40	15.56	22.15	17.01	12.75	42.25	4.70							
2014 Elmira NY	27	3.62	6.04	18.52	29.01	37.04	37.79	33.33	27.16	11.11	24.58	59.26	16.98	25.93	16.91	7.41	41.53	7.41							
2014 Rochester NY	221	29.62	8.10	17.19	13.75	28.96	52.91	50.23	25.24	3.62	24.14	67.42	16.18	22.17	18.09	9.05	41.60	1.36							
2014 Syracuse NY	29	3.89	9.43	0.00	17.61	48.28	44.44	48.28	28.51	3.45	24.53	75.86	16.37	6.90	17.51	13.79	41.59	3.45							
2014 Watertown-Fort Drum NY MSA	37	4.96	0.00	0.00	23.32	40.54	60.76	40.54	15.92	18.92	22.55	48.65	16.41	24.32	19.79	8.11	41.25	18.92							
2014 Western Non-MSA NY	124	16.62	1.20	0.00	13.53	22.58	76.18	72.58	9.10	4.84	24.92	58.87	16.67	19.35	19.09	14.52	39.32	7.26							

\* Consumer Loans originated and purchased in the MA/AA as a percentage of all consumer loans originated and purchased in the rated area.  
 \*\* Percentage of households is based on 2010 Census Information.

**Table 14. Qualified Investments**

QUALIFIED INVESTMENTS		Geography: NEW YORK				Evaluation Period: JUNE 24, 2012 TO JULY 13, 2015			
Assessment Area:	Prior Period Investments*		Current Period Investments		Total Investments			Unfunded Commitments**	
	#	\$(000's)	#	\$(000's)	#	\$(000's)	% of Total	#	\$(000's)
<b>Full Review:</b>									
2014 Utica-Rome NY MSA	0	0	4	289	4	289	15.24	0	0
<b>Limited Review:</b>									
2014 Albany-Schenectady-Troy NY MSA	0	0	4	316	4	316	16.67	0	0
2014 Buffalo-Cheektowaga-Niagara Falls NY MSA	0	0	7	604	7	604	31.86	0	0
2014 Elmira NY MSA	0	0	1	80	1	80	4.22	0	0
2014 Rochester NY MSA	0	0	5	400	5	400	21.10	0	0
2014 Syracuse NY MSA	0	0	2	104	2	104	5.49	0	0
2014 Watertown-Fort Drum NY MSA	0	0	0	0	0	0	0.00	0	0
2014 Western Non-MSA NY	0	0	3	50	3	50	2.64	0	0

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

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

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

DISTRIBUTION OF BRANCH DELIVERY SYSTEM AND BRANCH OPENINGS/CLOSINGS																	Geography: NEW YORK				Evaluation Period: JANUARY 1, 2014 TO JUNE 30, 2015			
MA/Assessment Area:	Deposits	Branches						Branch Openings/Closings						Population										
	% of Rated Area Deposits in AA	# of BANK Branches	% of Rated Area Branches in AA	Location of Branches by Income of Geographies (%)				# of Branch Openings	# of Branch Closings	Net change in Location of Branches (+ or -)				% of Population within Each Geography										
				Low	Mod	Mid	Upp			Low	Mod	Mid	Upp	Low	Mod	Mid	Upp							
<b>Full Review:</b>																								
2014 Utica-Rome NY MSA	19.06	2	12.50	0.00	0.00	50.00	50.00	0	0	0	0	0	0	6.71	14.14	53.10	24.02							
<b>Limited Review:</b>																								
2014 Albany-Schenectady-Troy NY	10.20	2	12.50	0.00	50.00	0.00	50.00	0	0	0	0	0	0	15.08	12.74	39.29	32.89							
2014 Buffalo-Cheektowaga-Niagara Falls NY MSA	13.41	2	12.50	0.00	0.00	100.00	0.00	0	0	0	0	0	0	9.57	17.03	39.03	33.16							
2014 Elmira NY MSA	10.56	1	6.25	0.00	100.00	0.00	0.00	0	0	0	0	0	0	6.06	26.47	36.57	28.89							
2014 Rochester NY	16.62	4	25.00	0.00	25.00	75.00	0.00	0	1	0	0	-1	0	8.67	13.15	51.54	26.32							
2014 Syracuse NY	2.92	1	6.25	0.00	100.00	0.00	0.00	0	0	0	0	0	0	10.26	16.23	44.09	29.35							
2014 Watertown-Fort Drum NY MSA	7.12	1	6.25	0.00	0.00	0.00	100.00	0	0	0	0	0	0	0.00	24.21	58.69	17.09							
2014 Western Non-MSA	20.11	3	18.75	0.00	0.00	66.67	33.33	0	0	0	0	0	0	0.96	12.95	76.56	9.53							

## North Carolina

Table 1. Lending Volume

LENDING VOLUME		Geography: NORTH CAROLINA						Evaluation Period: JANUARY 1, 2014 TO JUNE 30, 2015				
Assessment Area (2014):	% of Rated Area Loans (#) in MA/AA'	Home Mortgage		Small Loans to Businesses		Small Loans to Farms		Community Development Loans**		Total Reported Loans		% of Rated Area Deposits in MA/AA***
		#	\$ (000's)	#	\$ (000's)	#	\$ (000's)	#	\$ (000's)	#	\$(000's)	
<b>Full Review:</b>												
2014 Winston-Salem NC	8.83	23	2,522	26	63	0	0	3	117	52	2,702	10.49
<b>Limited Review:</b>												
2014 Anson and Stanly Counties NC	1.02	3	415	2	2	0	0	1	125	6	542	2.61
2014 Asheville NC MSA	7.47	36	4,523	7	182	0	0	1	62	44	4,767	6.33
2014 Burlington NC MSA	5.60	26	3,173	6	13	0	0	1	14	33	3,200	3.29
2014 Carteret County NC	1.36	3	429	4	6	0	0	1	9	8	444	1.59
2014 Cleveland and Rutherford Counties NC	4.58	23	2,820	1	1	0	0	3	34	27	2,855	4.85
2014 Duplin County NC	0.51	0	0	2	2	0	0	1	10	3	12	1.02
2014 Durham-Chapel Hill	9.51	35	4,495	20	37	0	0	1	15	56	4,547	3.60
2014 Fayetteville NC	4.92	24	2,035	4	12	0	0	1	11	29	2,058	1.70
2014 Goldsboro NC MSA	1.36	4	346	3	6	0	0	1	25	8	377	3.86
2014 Greensboro-High Point NC MSA	9.17	22	1,883	29	488	0	0	3	36	54	2,407	16.62
2014 Greenville NC MSA	4.41	22	2,733	3	6	0	0	1	14	26	2,753	1.93
2014 Hickory-Lenoir-Morganton NC MSA	5.60	25	2,397	7	18	0	0	1	22	33	2,437	7.27

\* Loan Data as of June 30, 2015. Rated area refers to either state or multistate MA rating area.

\*\* The evaluation period for Community Development Loans is from January 01, 2014 to July 13, 2015.

\*\*\* Deposit Data as of June 30, 2014. Rated Area refers to either the state, multistate MA, or institution, as appropriate.



**Table 1. Lending Volume**

LENDING VOLUME		Geography: NORTH CAROLINA						Evaluation Period: JANUARY 1, 2014 TO JUNE 30, 2015				
Assessment Area (2014):	% of Rated Area Loans (#) in MA/AA*	Home Mortgage		Small Loans to Businesses		Small Loans to Farms		Community Development Loans**		Total Reported Loans		% of Rated Area Deposits in MA/AA***
		#	\$ (000's)	#	\$ (000's)	#	\$ (000's)	#	\$ (000's)	#	\$ (000's)	
<b>Limited Review:</b>												
2014 Jacksonville NC	3.90	17	1,656	5	9	0	0	1	8	23	1,673	1.19
2014 New Bern NC MSA	3.06	16	1,663	1	1	0	0	1	11	18	1,675	2.39
2014 Northern Non-MSA	3.06	7	816	9	26	0	0	2	33	18	875	2.98
2014 Pasquotank County	0.68	2	175	1	1	0	0	1	5	4	181	1.39
2014 Raleigh NC MSA	9.68	31	4,414	25	159	0	0	1	90	57	4,663	13.51
2014 Rocky Mount NC	3.06	5	448	12	49	0	0	1	15	18	512	3.02
2014 South Central Non-MSA	7.64	29	3,652	15	318	0	0	1	20	45	3,990	8.28
2014 Surry and Wilkes Counties NC	4.58	24	3,101	3	5	0	0	0	0	27	3,106	2.08

\* Loan Data as of June 30, 2015. Rated area refers to either state or multistate MA rating area.

\*\* The evaluation period for Community Development Loans is from January 01, 2014 to July 13, 2015.

\*\*\* Deposit Data as of June 30, 2014. Rated Area refers to either the state, multistate MA, or institution, as appropriate.

**Table 1. Other Products**

LENDING VOLUME		Geography: NORTH CAROLINA						Evaluation Period: JANUARY 1, 2014 TO JUNE 30, 2015						
Assessment Area (2014):	% of Rated Area Loans (#) in MA/AA*	Total Optional Loans**		Small Business Real Estate Secured**		Home Equity**		Motor Vehicle**		Credit Card**		Other Secured Consumer**		% of Rated Area Deposits in AA***
		#	\$ (000's)	#	\$ (000's)	#	\$ (000's)	#	\$ (000's)	#	\$ (000's)	#	\$ (000's)	
<b>Full Review:</b>														
2014 Winston-Salem NC MSA	13.89	374	486	0	0	0	0	0	0	0	0	0	0	10.49
<b>Limited Review:</b>														
2014 Anson and Stanly Counties NC	3.04	82	110	0	0	0	0	0	0	0	0	0	0	2.61
2014 Asheville NC MSA	7.28	196	235	0	0	0	0	0	0	0	0	0	0	6.33
2014 Burlington NC MSA	3.19	86	110	0	0	0	0	0	0	0	0	0	0	3.29
2014 Carteret County NC	1.89	51	75	0	0	0	0	0	0	0	0	0	0	1.59
2014 Cleveland and Rutherford Counties NC	3.97	107	135	0	0	0	0	0	0	0	0	0	0	4.85
2014 Duplin County NC	1.41	38	43	0	0	0	0	0	0	0	0	0	0	1.02
2014 Durham-Chapel Hill	3.71	100	133	0	0	0	0	0	0	0	0	0	0	3.60
2014 Fayetteville NC	1.93	52	69	0	0	0	0	0	0	0	0	0	0	1.70
2014 Goldsboro NC MSA	2.93	79	108	0	0	0	0	0	0	0	0	0	0	3.86
2014 Greensboro-High Point NC MSA	14.41	388	495	0	0	0	0	0	0	0	0	0	0	16.62
2014 Greenville NC MSA	2.23	60	71	0	0	0	0	0	0	0	0	0	0	1.93
2014 Hickory-Lenoir-Morganton NC MSA	5.72	154	212	0	0	0	0	0	0	0	0	0	0	7.27

\* Loan Data as of June 30, 2014. Rated area refers to either state or multistate MA rating area.

\*\* The evaluation period for Optional Product Line(s) is from January 01, 2014 to June 30, 2015.

\*\*\* Deposit Data as of July 08, 2015. Rated Area refers to either the state, multistate MA, or institution, as appropriate.

Table 1. Other Products

LENDING VOLUME		Geography: NORTH CAROLINA						Evaluation Period: JANUARY 1, 2014 TO JUNE 30, 2015						
Assessment Area (2014):	% of Rated Area Loans (#) in MA/AA <sup>1</sup>	Total Optional Loans <sup>**</sup>		Small Business Real Estate Secured <sup>**</sup>		Home Equity <sup>**</sup>		Motor Vehicle <sup>**</sup>		Credit Card <sup>**</sup>		Other Secured Consumer <sup>**</sup>		% of Rated Area Deposits in AA <sup>***</sup>
		#	\$ (000's)	#	\$ (000's)	#	\$ (000's)	#	\$ (000's)	#	\$ (000's)	#	\$(000's)	
<b>Limited Review:</b>														
2014 Jacksonville NC MSA	1.41	38	49	0	0	0	0	0	0	0	0	0	0	1.19
2014 New Bern NC MSA	2.49	67	83	0	0	0	0	0	0	0	0	0	0	2.39
2014 Northern Non-MSA NC	4.98	134	154	0	0	0	0	0	0	0	0	0	0	2.98
2014 Pasquotank County NC	0.93	25	32	0	0	0	0	0	0	0	0	0	0	1.39
2014 Raleigh NC MSA	10.43	281	367	0	0	0	0	0	0	0	0	0	0	13.51
2014 Rocky Mount NC MSA	4.16	112	131	0	0	0	0	0	0	0	0	0	0	3.02
2014 South Central Non-MSA	6.91	186	226	0	0	0	0	0	0	0	0	0	0	8.28
2014 Surry and Wilkes Counties	3.08	83	102	0	0	0	0	0	0	0	0	0	0	2.08

<sup>1</sup> Loan Data as of June 30, 2014. Rated area refers to either state or multistate MA rating area.

<sup>\*\*</sup> The evaluation period for Optional Product Line(s) is from January 01, 2014 to June 30, 2015.

<sup>\*\*\*</sup> Deposit Data as of June 30, 2014. Rated Area refers to either the state, multistate MA, or institution, as appropriate.

**Table 1. Other Products**

LENDING VOLUME	Geography: NORTH CAROLINA		Evaluation Period: JANUARY 1, 2014 TO JUNE 30, 2015	
	Other Unsecured Consumer Loans <sup>1</sup>		Other Optional Loans*	
Assessment Area (2014):	#	\$ (000's)	#	\$ (000's)
<b>Full Review:</b>				
2014 Winston-Salem NC	374	486	0	0
<b>Limited Review:</b>				
2014 Anson and Stanly Counties NC	82	110	0	0
2014 Asheville NC MSA	196	235	0	0
2014 Burlington NC MSA	86	110	0	0
2014 Carteret County NC	51	75	0	0
2014 Cleveland and Rutherford Counties NC	107	135	0	0
2014 Duplin County NC	38	43	0	0
2014 Durham-Chapel Hill	100	133	0	0
2014 Fayetteville NC	52	69	0	0
2014 Goldsboro NC MSA	79	108	0	0
2014 Greensboro-High Point NC MSA	388	495	0	0
2014 Greenville NC MSA	60	71	0	0
2014 Hickory-Lenoir-Morganton NC MSA	154	212	0	0
2014 Jacksonville NC	38	49	0	0
2014 New Bern NC MSA	67	83	0	0
2014 Northern Non-MSA	134	154	0	0
2014 Pasquotank County	25	32	0	0
2014 Raleigh NC MSA	281	367	0	0
2014 Rocky Mount NC	112	131	0	0
2014 South Central Non-MSA NC	186	226	0	0
2014 Surry and Wilkes Counties NC	83	102	0	0

\* The evaluation period for Optional Product Line(s) is from January 01, 2014 to June 30, 2015.

**Table 4. Geographic Distribution of Home Mortgage Refinance Loans**

Geographic Distribution: HOME MORTGAGE REFINANCE			Geography: NORTH CAROLINA				Evaluation Period: JANUARY 1, 2014 TO JUNE 30, 2015					Market Share (%) by Geography*				
Assessment Area:	Total Home Mortgage Refinance Loans		Low-Income Geographies		Moderate-Income Geographies		Middle-Income Geographies		Upper-Income Geographies		Overall	Low	Mod	Mid	Upp	
	#	% of Total**	% Owner Occ Units***	% BANK Loans****	% Owner Occ Units***	% BANK Loans	% Owner Occ Units***	% BANK Loans	% Owner Occ Units***	% BANK Loans						
<b>Full Review:</b>																
2014 Winston-Salem NC MSA	22	6.04	2.41	4.55	14.84	18.18	49.93	36.36	32.82	40.91	0.45	1.12	0.61	0.35	0.49	
<b>Limited Review:</b>																
2014 Anson and Stanly Counties NC	3	0.82	0.00	0.00	11.33	0.00	36.85	0.00	51.82	100.00	0.58	0.00	0.00	0.00	0.95	
2014 Asheville NC MSA	35	9.62	0.84	2.86	14.00	22.86	65.01	62.86	20.15	11.43	0.78	0.00	1.18	0.82	0.38	
2014 Burlington NC MSA	25	6.87	0.00	0.00	17.12	24.00	48.25	44.00	34.63	32.00	1.08	0.00	2.31	1.09	0.63	
2014 Carteret County NC	3	0.82	0.00	0.00	1.07	0.00	53.57	0.00	45.36	100.00	0.37	0.00	0.00	0.00	0.68	
2014 Cleveland and Rutherford Counties NC	23	6.32	2.12	8.70	7.10	13.04	81.98	65.22	8.79	13.04	0.93	0.00	2.30	0.85	0.66	
2014 Duplin County NC	0	0.00	0.00	0.00	20.04	0.00	79.96	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	
2014 Durham-Chapel Hill NC MSA	34	9.34	3.19	8.82	17.05	20.59	41.26	41.18	38.49	29.41	0.59	0.79	0.76	0.67	0.43	
2014 Fayetteville NC MSA	22	6.04	1.60	0.00	9.12	4.55	51.22	77.27	38.06	18.18	0.36	0.00	0.39	0.47	0.20	
2014 Goldsboro NC MSA	4	1.10	0.80	0.00	8.93	0.00	64.44	75.00	25.82	25.00	0.54	0.00	0.00	0.68	0.40	
2014 Greensboro-High Point NC MSA	21	5.77	2.40	9.52	18.68	33.33	46.37	52.38	32.55	4.76	0.38	1.94	0.80	0.46	0.05	
2014 Greenville NC MSA	22	6.04	1.81	0.00	12.50	9.09	44.73	50.00	40.96	40.91	0.84	0.00	1.65	1.23	0.38	
2014 Hickory-Lenoir-Morganton NC MSA	23	6.32	0.00	0.00	14.07	13.04	62.71	52.17	23.21	34.78	1.21	0.00	1.52	1.06	1.40	

\* Based on 2014 Peer Mortgage Data – US and PR

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

\*\*\* Percentage of Owner Occupied Units is the number of owner occupied units in a particular geography divided by the number of owner occupied housing units in the area based on 2010 Census information.

\*\*\*\* Data shown includes only One to Four-family and manufactured housing. (Property type of 1 or 2)

**Table 4. Geographic Distribution of Home Mortgage Refinance Loans**

Geographic Distribution: HOME MORTGAGE REFINANCE			Geography: NORTH CAROLINA				Evaluation Period: JANUARY 1, 2014 TO JUNE 30, 2015					Market Share (%) by Geography'				
Assessment Area:	Total Home Mortgage Refinance Loans		Low-Income Geographies		Moderate-Income Geographies		Middle-Income Geographies		Upper-Income Geographies		Overall	Low	Mod	Mid	Upp	
	#	% of Total**	% Owner Occ Units***	% BANK Loans****	% Owner Occ Units***	% BANK Loans	% Owner Occ Units***	% BANK Loans	% Owner Occ Units***	% BANK Loans						
<b>Limited Review:</b>																
2014 Jacksonville NC MSA	17	4.67	0.00	0.00	3.78	0.00	65.06	58.82	31.16	41.18	0.44	0.00	0.00	0.28	0.90	
2014 New Bern NC MSA	16	4.40	2.76	0.00	17.91	31.25	41.78	43.75	37.55	25.00	0.82	0.00	3.10	0.92	0.20	
2014 Northern Non-MSA NC	7	1.92	1.78	14.29	33.44	14.29	57.46	57.14	7.33	14.29	0.67	5.88	0.00	0.68	0.92	
2014 Pasquotank County NC	2	0.55	2.61	0.00	0.00	0.00	37.62	50.00	59.78	50.00	0.60	0.00	0.00	0.92	0.45	
2014 Raleigh NC MSA	30	8.24	2.49	3.33	25.77	30.00	38.29	50.00	33.45	16.67	0.22	0.37	0.31	0.27	0.11	
2014 Rocky Mount NC MSA	4	1.10	0.00	0.00	13.89	25.00	57.58	25.00	28.53	50.00	0.24	0.00	1.25	0.00	0.36	
2014 South Central Non-MSA NC	28	7.69	2.29	3.57	19.66	17.86	45.20	46.43	32.84	32.14	0.73	3.33	1.33	0.73	0.58	
2014 Surry and Wilkes Counties NC	23	6.32	0.00	0.00	8.85	0.00	78.06	86.96	13.09	13.04	0.94	0.00	0.00	1.13	0.63	

\* Based on 2014 Peer Mortgage Data – US and PR

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

\*\*\* Percentage of Owner Occupied Units is the number of owner occupied units in a particular geography divided by the number of owner occupied housing units in the area based on 2010 Census information.

\*\*\*\* Data shown includes only One to Four-family and manufactured housing. (Property type of 1 or 2)

**Table 6. Geographic Distribution of Small Loans to Businesses**

Geographic Distribution: SMALL LOANS TO BUSINESSES			Geography: NORTH CAROLINA				Evaluation Period: JANUARY 1, 2014 TO JUNE 30, 2015					Market Share (%) by Geography				
Assessment Area:	Total Small Business Loans		Low-Income Geographies		Moderate-Income Geographies		Middle-Income Geographies		Upper-Income Geographies		Overall	Low	Mod	Mid	Upp	
	#	% of Total**	% of Businesses***	% BANK Loans	% of Businesses***	% BANK Loans	% of Businesses***	% BANK Loans	% of Businesses***	% BANK Loans						
<b>Full Review:</b>																
2014 Winston-Salem NC MSA	26	14.05	4.35	19.23	17.17	30.77	44.59	46.15	33.88	3.85	0.23	1.01	0.44	0.26	0.03	
<b>Limited Review:</b>																
2014 Anson and Stanly Counties NC	2	1.08	0.00	0.00	13.76	0.00	38.22	50.00	48.03	50.00	0.10	0.00	0.00	0.00	0.22	
2014 Asheville NC MSA	7	3.78	4.27	0.00	16.43	14.29	54.91	85.71	24.38	0.00	0.08	0.00	0.07	0.14	0.00	
2014 Burlington NC MSA	6	3.24	0.00	0.00	18.26	33.33	50.50	50.00	31.24	16.67	0.15	0.00	0.28	0.20	0.00	
2014 Carteret County NC	4	2.16	0.00	0.00	6.41	0.00	43.34	50.00	50.25	50.00	0.27	0.00	0.00	0.30	0.28	
2014 Cleveland and Rutherford Counties NC	1	0.54	4.58	0.00	12.49	0.00	72.79	100.00	10.14	0.00	0.06	0.00	0.00	0.08	0.00	
2014 Duplin County NC	2	1.08	0.00	0.00	20.63	0.00	79.37	100.00	0.00	0.00	0.19	0.00	0.00	0.24	0.00	
2014 Durham-Chapel Hill NC MSA	20	10.81	6.01	15.00	20.03	35.00	36.49	40.00	36.76	10.00	0.17	0.70	0.26	0.19	0.06	
2014 Fayetteville NC MSA	4	2.16	8.39	0.00	9.63	25.00	46.55	25.00	35.30	50.00	0.11	0.00	0.38	0.06	0.14	
2014 Goldsboro NC MSA	3	1.62	3.96	0.00	15.24	33.33	61.85	33.33	18.96	33.33	0.22	0.00	0.69	0.12	0.34	
2014 Greensboro-High Point NC MSA	29	15.68	6.11	6.90	19.88	17.24	43.31	44.83	30.61	31.03	0.16	0.14	0.23	0.17	0.11	
2014 Greenville NC MSA	3	1.62	2.46	0.00	22.64	33.33	37.57	0.00	37.33	66.67	0.04	0.00	0.00	0.00	0.13	
2014 Hickory-Lenoir-Morganton NC MSA	7	3.78	0.00	0.00	20.64	42.86	53.67	57.14	25.69	0.00	0.12	0.00	0.26	0.12	0.00	

\* Based on 2014 Peer Small Business Data – US and PR

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

\*\*\* Source Data - Dun and Bradstreet (2014).

**Table 6. Geographic Distribution of Small Loans to Businesses**

Geographic Distribution: SMALL LOANS TO BUSINESSES			Geography: NORTH CAROLINA				Evaluation Period: JANUARY 1, 2014 TO JUNE 30, 2015					Market Share (%) by Geography <sup>1</sup>				
Assessment Area:	Total Small Business Loans		Low-Income Geographies		Moderate-Income Geographies		Middle-Income Geographies		Upper-Income Geographies		Overall	Low	Mod	Mid	Upp	
	#	% of Total <sup>**</sup>	% of Businesses <sup>***</sup>	% BANK Loans	% of Businesses <sup>**</sup>	% BANK Loans	% of Businesses <sup>***</sup>	% BANK Loans	% of Businesses <sup>***</sup>	% BANK Loans						
<b>Limited Review:</b>																
2014 Jacksonville NC MSA	5	2.70	0.00	0.00	9.47	40.00	65.36	60.00	23.62	0.00	0.24	0.00	1.07	0.19	0.00	
2014 New Bern NC MSA	1	0.54	8.53	0.00	15.91	100.00	40.22	0.00	35.35	0.00	0.00	0.00	0.00	0.00	0.00	
2014 Northern Non-MSA NC	9	4.86	2.37	0.00	26.95	11.11	61.22	88.89	9.46	0.00	0.45	0.00	0.25	0.65	0.00	
2014 Pasquotank County NC	1	0.54	7.34	0.00	0.00	0.00	47.10	0.00	45.57	100.00	0.19	0.00	0.00	0.00	0.40	
2014 Raleigh NC MSA	25	13.51	4.70	12.00	23.35	20.00	33.60	64.00	38.16	4.00	0.08	0.11	0.08	0.16	0.01	
2014 Rocky Mount NC MSA	12	6.49	0.00	0.00	17.51	8.33	56.79	66.67	25.70	25.00	0.57	0.00	0.46	0.59	0.68	
2014 South Central Non-MSA NC	15	8.11	3.80	0.00	18.51	13.33	45.90	46.67	31.79	40.00	0.19	0.00	0.00	0.23	0.26	
2014 Surry and Wilkes Counties NC	3	1.62	0.00	0.00	9.71	0.00	73.56	100.00	16.73	0.00	0.06	0.00	0.00	0.08	0.00	

\* Based on 2014 Peer Small Business Data – US and PR

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

\*\*\* Source Data - Dun and Bradstreet (2014).



**Table 10. Borrower Distribution of Home Mortgage Refinance Loans**

Borrower Distribution: HOME MORTGAGE REFINANCE			Geography: NORTH CAROLINA				Evaluation Period: JANUARY 1, 2014 TO JUNE 30, 2015					Market Share*				
Assessment Area:	Total Home Mortgage Refinance Loans		Low-Income Borrowers		Moderate-Income Borrowers		Middle-Income Borrowers		Upper-Income Borrowers		Market Share*					
	#	% of Total**	% Families***	% BANK Loans****	% Families <sup>34</sup>	% BANK Loans****	% Families***	% BANK Loans****	% Families***	% BANK Loans****	Overall	Low	Mod	Mid	Upp	
<b>Full Review:</b>																
2014 Winston-Salem NC MSA	22	6.04	21.29	22.73	17.48	22.73	20.77	18.18	40.45	36.36	0.57	1.33	0.72	0.43	0.41	
<b>Limited Review:</b>																
2014 Anson and Stanly Counties NC	3	0.82	16.17	0.00	17.89	0.00	20.56	66.67	45.39	33.33	0.70	0.00	0.00	1.72	0.49	
2014 Asheville NC	35	9.62	19.73	22.86	18.73	25.71	21.67	28.57	39.87	22.86	0.92	2.19	1.28	1.18	0.43	
2014 Burlington NC	25	6.87	21.32	13.04	16.95	26.09	20.70	43.48	41.03	17.39	1.12	1.16	3.05	1.48	0.19	
2014 Carteret County	3	0.82	14.74	0.00	13.29	33.33	21.52	66.67	50.45	0.00	0.46	0.00	1.79	1.77	0.00	
2014 Cleveland and Rutherford Counties	23	6.32	22.68	4.35	16.88	17.39	21.42	26.09	39.02	52.17	1.08	1.49	2.00	0.80	0.88	
2014 Duplin County	0	0.00	24.76	0.00	20.28	0.00	19.71	0.00	35.25	0.00	0.00	0.00	0.00	0.00	0.00	
2014 Durham-Chapel Hill NC MSA	34	9.34	23.17	23.53	16.93	29.41	18.54	20.59	41.35	26.47	0.73	1.76	1.54	0.70	0.36	
2014 Fayetteville NC	22	6.04	21.19	18.18	17.83	27.27	18.93	13.64	42.05	40.91	0.75	2.48	1.63	0.53	0.40	
2014 Goldsboro NC	4	1.10	21.07	0.00	17.71	50.00	21.48	0.00	39.74	50.00	0.81	0.00	2.27	0.00	0.79	
2014 Greensboro-High Point NC MSA	21	5.77	21.85	38.10	18.11	23.81	19.22	19.05	40.83	19.05	0.49	2.35	0.64	0.38	0.19	
2014 Greenville NC	22	6.04	24.27	0.00	15.75	18.18	18.08	13.64	41.90	68.18	1.11	0.00	1.80	1.54	0.88	
2014 Hickory-Lenoir-Morganton NC MSA	23	6.32	19.95	21.74	18.02	39.13	20.97	4.35	41.07	34.78	1.52	3.42	2.61	0.96	1.02	

\* Based on 2014 Peer Mortgage Data – US and PR

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

\*\*\* Percentage of Families is based on the 2010 Census information.

\*\*\*\* As a percentage of loans with borrower income information available. No information was available for 0.5% of loans originated and purchased by bank.

34 Data shown includes only One to Four-family and manufactured housing. (Property type of 1 or 2)

**Table 10. Borrower Distribution of Home Mortgage Refinance Loans**

Borrower Distribution: HOME MORTGAGE REFINANCE			Geography: NORTH CAROLINA				Evaluation Period: JANUARY 1, 2014 TO JUNE 30, 2015					Market Share*				
Assessment Area:	Total Home Mortgage Refinance Loans		Low-Income Borrowers		Moderate-Income Borrowers		Middle-Income Borrowers		Upper-Income Borrowers		Overall	Low	Mod	Mid	Upp	
	#	% of Total**	% Families***	% BANK Loans****	% Families <sup>35</sup>	% BANK Loans****	% Families***	% BANK Loans****	% Families***	% BANK Loans****						
<b>Limited Review:</b>																
2014 Jacksonville NC	17	4.67	17.24	0.00	19.80	23.53	22.76	17.65	40.20	58.82	1.17	0.00	2.02	1.82	0.86	
2014 New Bern NC	16	4.40	21.12	12.50	17.62	12.50	20.11	18.75	41.15	56.25	1.25	2.27	1.83	1.12	0.97	
2014 Northern Non-MSA NC	7	1.92	27.68	0.00	18.07	42.86	19.28	14.29	34.97	42.86	0.81	0.00	1.96	0.62	0.65	
2014 Pasquotank County NC	2	0.55	18.50	0.00	13.63	50.00	18.65	50.00	49.23	0.00	0.92	0.00	3.85	1.52	0.00	
2014 Raleigh NC	30	8.24	22.19	26.67	17.14	20.00	20.00	26.67	40.67	26.67	0.28	0.84	0.30	0.37	0.13	
2014 Rocky Mount NC MSA	4	1.10	22.34	0.00	16.93	50.00	20.14	25.00	40.59	25.00	0.33	0.00	2.06	0.00	0.00	
2014 South Central Non-MSA NC	28	7.69	22.98	7.14	16.71	17.86	18.49	21.43	41.82	53.57	1.12	0.88	2.11	0.84	0.98	
2014 Surry and Wilkes Counties NC	23	6.32	23.24	4.35	18.21	21.74	18.90	26.09	39.65	47.83	1.08	0.00	2.05	1.06	0.88	

\* Based on 2014 Peer Mortgage Data – US and PR

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

\*\*\* Percentage of Families is based on the 2010 Census information.

\*\*\*\* As a percentage of loans with borrower income information available. No information was available for 0.5% of loans originated and purchased by bank.

35 Data shown includes only One to Four-family and manufactured housing. (Property type of 1 or 2)

**Table 11. Borrower Distribution of Small Loans to Businesses**

Borrower Distribution: SMALL LOANS TO BUSINESSES			Geography: NORTH CAROLINA		Evaluation Period: JANUARY 1, 2014 TO JUNE 30, 2015				
Assessment Area:	Total Small Loans to Businesses		Businesses With Revenues of \$1 million or less		Loans by Original Amount Regardless of Business Size			Market Share <sup>†</sup>	
	#	% of Total <sup>**</sup>	% of Businesses <sup>***</sup>	% BANK Loans <sup>****</sup>	\$100,000 or less	>\$100,000 to \$250,000	>\$250,000 to \$1,000,000	All	Rev\$ 1 Million or Less
<b>Full Review:</b>									
2014 Winston-Salem NC MSA	26	14.05	73.37	100.00	100.00	0.00	0.00	0.23	0.48
<b>Limited Review:</b>									
2014 Anson and Stanly Counties NC	2	1.08	73.27	100.00	100.00	0.00	0.00	0.10	0.27
2014 Asheville NC MSA	7	3.78	70.49	71.43	85.71	14.29	0.00	0.08	0.13
2014 Burlington NC MSA	6	3.24	71.17	83.33	100.00	0.00	0.00	0.15	0.35
2014 Carteret County NC	4	2.16	75.59	100.00	100.00	0.00	0.00	0.27	0.50
2014 Cleveland and Rutherford Counties NC	1	0.54	71.80	100.00	100.00	0.00	0.00	0.06	0.13
2014 Duplin County NC	2	1.08	74.67	100.00	100.00	0.00	0.00	0.19	0.37
2014 Durham-Chapel Hill NC MSA	20	10.81	71.14	100.00	100.00	0.00	0.00	0.17	0.34
2014 Fayetteville NC MSA	4	2.16	71.83	100.00	100.00	0.00	0.00	0.11	0.22
2014 Goldsboro NC MSA	3	1.62	72.87	100.00	100.00	0.00	0.00	0.22	0.51
2014 Greensboro-High Point NC MSA	29	15.68	70.56	86.21	89.66	10.34	0.00	0.16	0.26
2014 Greenville NC MSA	3	1.62	71.28	100.00	100.00	0.00	0.00	0.04	0.11
2014 Hickory-Lenoir-Morganton NC MSA	7	3.78	71.46	85.71	100.00	0.00	0.00	0.12	0.19

\* Based on 2014 Peer Small Business Data – US and PR

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

\*\*\* Businesses with revenues of \$1 million or less as a percentage of all businesses (Source D&B - 2014).

\*\*\*\* Small loans to businesses with revenues of \$1 million or less as a percentage of all loans reported as small loans to businesses. No information was available for 4.32% of small loans to businesses originated and purchased by the bank.

**Table 11. Borrower Distribution of Small Loans to Businesses**

Borrower Distribution: SMALL LOANS TO BUSINESSES		Geography: NORTH CAROLINA			Evaluation Period: JANUARY 1, 2014 TO JUNE 30, 2015				
Assessment Area:	Total Small Loans to Businesses		Businesses With Revenues of \$1 million or less		Loans by Original Amount Regardless of Business Size			Market Share <sup>†</sup>	
	#	% of Total <sup>**</sup>	% of Businesses <sup>***</sup>	% BANK Loans <sup>****</sup>	\$100,000 or less	>\$100,000 to \$250,000	>\$250,000 to \$1,000,000	All	Rev\$ 1 Million or Less
<b>Limited Review:</b>									
2014 Jacksonville NC MSA	5	2.70	74.39	100.00	100.00	0.00	0.00	0.24	0.50
2014 New Bern NC MSA	1	0.54	72.55	100.00	100.00	0.00	0.00	0.00	0.00
2014 Northern Non-MSA NC	9	4.86	71.05	100.00	100.00	0.00	0.00	0.45	1.01
2014 Pasquotank County NC	1	0.54	70.57	100.00	100.00	0.00	0.00	0.19	0.46
2014 Raleigh NC MSA	25	13.51	72.68	100.00	96.00	4.00	0.00	0.08	0.16
2014 Rocky Mount NC MSA	12	6.49	70.73	100.00	100.00	0.00	0.00	0.57	1.46
2014 South Central Non-MSA NC	15	8.11	72.52	80.00	86.67	13.33	0.00	0.19	0.30
2014 Surry and Wilkes Counties NC	3	1.62	72.82	66.67	100.00	0.00	0.00	0.06	0.00

\* Based on 2014 Peer Small Business Data – US and PR

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

\*\*\* Businesses with revenues of \$1 million or less as a percentage of all businesses (Source D&B - 2014).

\*\*\*\* Small loans to businesses with revenues of \$1 million or less as a percentage of all loans reported as small loans to businesses. No information was available for 4.32% of small loans to businesses originated and purchased by the bank.

**Table 13. Geographic and Borrower Distribution of Consumer Loans**

Geographic and Borrower Distribution: CONSUMER LOANS																			Geography: NORTH CAROLINA				Evaluation Period: JANUARY 1, 2014 TO JUNE 30, 2015			
Assessment Area:	Geographic Distribution										Borrower Distribution															
	Total Consumer Loans		Low-Income Geographies		Moderate-Income Geographies		Middle-Income Geographies		Upper-Income Geographies		Low-Income Borrowers		Moderate-Income Borrowers		Middle-Income Borrowers		Upper-Income Borrowers									
	#	% of Total*	% of Hhlds**	% of BANK Loans	% of Hhlds**	% of BANK Loans	% of Hhlds**	% of BANK Loans	% of Hhlds**	% of BANK Loans	% of Hhlds**	% of BANK Loans	% of Hhlds**	% of BANK Loans	% of Hhlds**	% of BANK Loans	% of Hhlds**	% of BANK Loans								
<b>Full Review:</b>																										
2014 Winston-Salem NC MSA	374	13.89	5.66	8.02	19.88	30.75	45.62	47.06	28.84	14.17	23.61	64.17	16.83	22.19	17.76	8.82	41.80	4.81								
<b>Limited Review:</b>																										
2014 Anson and Stanly Counties NC	82	3.04	0.00	0.00	13.21	7.32	39.57	45.12	47.22	47.56	20.81	47.56	14.79	28.05	18.99	10.98	45.42	13.41								
2014 Asheville NC MSA	196	7.28	1.79	2.55	15.77	26.53	62.87	59.69	19.57	11.22	23.10	72.96	17.04	19.39	18.34	4.08	41.52	3.57								
2014 Burlington NC	86	3.19	0.00	0.00	21.77	34.88	47.94	48.84	30.30	16.28	24.44	66.28	16.89	20.93	17.74	8.14	40.93	4.65								
2014 Carteret County	51	1.89	0.00	0.00	2.90	9.80	53.68	58.82	43.41	31.37	17.19	50.98	12.82	19.61	17.66	19.61	52.33	9.80								
2014 Cleveland and Rutherford Counties NC	107	3.97	3.52	1.87	9.60	7.48	79.15	81.31	7.72	9.35	25.78	50.47	15.26	27.10	17.89	13.08	41.06	9.35								
2014 Duplin County NC	38	1.41	0.00	0.00	21.65	10.53	78.35	89.47	0.00	0.00	29.47	60.53	15.92	18.42	19.05	13.16	35.56	7.89								
2014 Durham-Chapel Hill NC MSA	100	3.71	8.50	20.00	21.85	18.00	36.22	47.00	33.26	15.00	24.71	64.00	16.09	25.00	17.02	4.00	42.18	7.00								
2014 Fayetteville NC	52	1.93	3.19	19.23	14.54	17.31	50.86	34.62	31.41	28.85	22.44	55.77	17.09	13.46	18.77	19.23	41.69	11.54								
2014 Goldsboro NC	79	2.93	2.52	3.80	13.76	18.99	62.71	69.62	21.00	7.59	24.09	54.43	15.99	27.85	18.77	11.39	41.16	6.33								
2014 Greensboro-High Point NC MSA	388	14.41	5.41	8.76	23.33	30.67	44.03	48.45	27.23	12.11	23.33	64.69	16.90	21.39	17.70	8.76	42.07	5.15								
2014 Greenville NC	60	2.23	6.49	10.00	19.42	28.33	41.13	41.67	32.96	20.00	28.65	70.00	12.91	18.33	16.20	5.00	42.24	6.67								
2014 Hickory-Lenoir-Morganton NC MSA	154	5.72	0.00	0.00	17.28	24.03	61.88	60.39	20.84	15.58	22.03	54.55	17.20	25.97	17.79	12.99	42.98	6.49								

\* Consumer Loans originated and purchased in the MA/AA as a percentage of all consumer loans originated and purchased in the rated area.  
 \*\* Percentage of households is based on 2010 Census Information.

**Table 13. Geographic and Borrower Distribution of Consumer Loans**

Geographic and Borrower Distribution: CONSUMER LOANS		Geography: NORTH CAROLINA									Evaluation Period: JANUARY 1, 2014 TO JUNE 30, 2015							
Assessment Area:	Geographic Distribution										Borrower Distribution							
	Total Consumer Loans		Low-Income Geographies		Moderate-Income Geographies		Middle-Income Geographies		Upper-Income Geographies		Low-Income Borrowers		Moderate-Income Borrowers		Middle-Income Borrowers		Upper-Income Borrowers	
	#	% of Total*	% of Hhlds**	% of BANK Loans	% of Hhlds**	% of BANK Loans	% of Hhlds**	% of BANK Loans	% of Hhlds**	% of BANK Loans	% of Hhlds**	% of BANK Loans	% of Hhlds**	% of BANK Loans	% of Hhlds**	% of BANK Loans	% of Hhlds**	% of BANK Loans
<b>Limited Review:</b>																		
2014 Jacksonville NC MSA	38	1.41	0.00	0.00	8.93	5.26	66.25	86.84	24.76	7.89	20.03	50.00	18.18	28.95	21.14	10.53	40.65	10.53
2014 New Bern NC MSA	67	2.49	5.89	5.97	21.16	17.91	42.33	37.31	30.62	38.81	22.96	62.69	17.25	17.91	17.88	11.94	41.91	7.46
2014 Northern Non-MSA NC	134	4.98	3.16	6.72	33.64	27.61	55.39	59.70	7.80	5.97	30.82	55.22	16.19	31.34	16.60	8.21	36.39	5.22
2014 Pasquotank County NC	25	0.93	7.82	12.00	0.00	0.00	43.24	56.00	48.94	32.00	20.14	60.00	12.20	12.00	18.15	16.00	49.51	12.00
2014 Raleigh NC MSA	281	10.43	5.72	7.47	28.11	50.18	36.09	35.23	30.07	7.12	22.81	68.33	17.35	21.71	18.14	5.34	41.70	4.63
2014 Rocky Mount NC MSA	112	4.16	0.00	0.00	17.71	25.00	56.69	60.71	25.60	14.29	25.93	61.61	14.32	21.43	18.30	11.61	41.45	5.36
2014 South Central Non-MSA NC	186	6.91	3.22	3.23	21.89	28.49	45.84	54.30	29.06	13.98	25.22	58.60	14.70	23.12	16.61	11.29	43.47	6.99
2014 Surry and Wilkes Counties NC	83	3.08	0.00	0.00	10.74	9.64	76.33	74.70	12.93	15.66	25.56	65.06	17.84	20.48	15.80	9.64	40.81	4.82

\* Consumer Loans originated and purchased in the MA/AA as a percentage of all consumer loans originated and purchased in the rated area.

\*\* Percentage of households is based on 2010 Census Information.

**Table 14. Qualified Investments**

QUALIFIED INVESTMENTS		Geography: NORTH CAROLINA				Evaluation Period: JUNE 24, 2012 TO JULY 13, 2015			
Assessment Area:	Prior Period Investments*		Current Period Investments		Total Investments			Unfunded Commitments**	
	#	\$(000's)	#	\$(000's)	#	\$(000's)	% of Total	#	\$(000's)
<b>Full Review:</b>									
2014 Winston-Salem NC MSA	1	86	12	1,066	13	1,152	18.31	0	0
<b>Limited Review:</b>									
2014 Anson and Stanly Counties NC	0	0	2	122	2	122	1.94	0	0
2014 Asheville NC MSA	0	0	3	343	3	343	5.45	0	0
2014 Burlington NC MSA	0	0	1	92	1	92	1.46	0	0
2014 Carteret County NC	0	0	1	127	1	127	2.02	0	0
2014 Cleveland and Rutherford Counties NC	0	0	2	103	2	103	1.64	0	0
2014 Duplin County NC	0	0	2	196	2	196	3.12	0	0
2014 Durham-Chapel Hill NC MSA	0	0	8	610	8	610	9.70	0	0
2014 Fayetteville NC MSA	0	0	2	251	2	251	3.98	0	0
2014 Goldsboro NC MSA	0	0	1	146	1	146	2.32	0	0
2014 Greensboro-High Point NC MSA	3	114	4	12	7	126	2.00	0	0
2014 Greenville NC MSA	0	0	2	233	2	233	3.70	0	0
2014 Hickory-Lenoir-Morganton NC MSA	0	0	2	249	2	249	3.96	0	0

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

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

**Table 14. Qualified Investments**

QUALIFIED INVESTMENTS		Geography: NORTH CAROLINA				Evaluation Period: JUNE 24, 2012 TO JULY 13, 2015			
Assessment Area:	Prior Period Investments*		Current Period Investments		Total Investments			Unfunded Commitments**	
	#	\$(000's)	#	\$(000's)	#	\$(000's)	% of Total	#	\$(000's)
<b>Limited Review:</b>									
2014 Jacksonville NC MSA	0	0	1	74	1	74	1.18	0	0
2014 New Bern NC MSA	0	0	1	107	1	107	1.70	0	0
2014 Northern Non-MSA NC	0	0	5	464	5	464	7.38	0	0
2014 Pasquotank County NC	0	0	1	61	1	61	0.97	0	0
2014 Raleigh NC MSA	1	188	13	1,287	14	1,475	23.45	0	0
2014 Rocky Mount NC MSA	0	0	1	84	1	84	1.34	0	0
2014 South Central Non-MSA NC	0	0	3	206	2	206	3.27	0	0
2014 Surry and Wilkes Counties NC	0	0	1	70	1	70	1.11	0	0

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

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



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

DISTRIBUTION OF BRANCH DELIVERY SYSTEM AND BRANCH OPENINGS/CLOSINGS								Geography: NORTH CAROLINA				Evaluation Period: JANUARY 1, 2014 TO JUNE 30, 2015					
MA/Assessment Area:	Deposits	Branches						Branch Openings/Closings				Population					
	% of Rated Area Deposits in AA	# of BANK Branches	% of Rated Area Branches in AA	Location of Branches by Income of Geographies (%)				# of Branch Openings	# of Branch Closings	Net change in Location of Branches (+ or -)				% of Population within Each Geography			
				Low	Mod	Mid	Upp			Low	Mod	Mid	Upp	Low	Mod	Mid	Upp
<b>Full Review:</b>																	
2014 Winston-Salem NC	10.49	7	9.59	0.00	42.86	57.14	0.00	0	0	0	0	0	0	5.96	19.94	45.35	28.75
<b>Limited Review:</b>																	
2014 Anson and Stanly Counties NC	2.61	3	4.11	0.00	33.33	0.00	66.67	0	0	0	0	0	0	0.00	12.46	41.30	46.23
2014 Asheville NC MSA	6.33	4	5.48	0.00	50.00	50.00	0.00	0	0	0	0	0	0	1.72	16.21	63.66	18.41
2014 Burlington NC	3.29	2	2.74	0.00	50.00	0.00	50.00	0	0	0	0	0	0	0.00	21.89	47.90	30.21
2014 Carteret County	1.59	1	1.37	0.00	0.00	0.00	100.00	0	0	0	0	0	0	0.00	2.29	55.74	41.98
2014 Cleveland and Rutherford Counties NC	4.85	2	2.74	0.00	0.00	100.00	0.00	0	0	0	0	0	0	2.70	8.97	80.03	8.31
2014 Duplin County NC	1.02	1	1.37	0.00	0.00	100.00	0.00	0	0	0	0	0	0	0.00	22.11	77.89	0.00
2014 Durham-Chapel Hill NC MSA	3.60	4	0.00	0.00	50.00	25.00	25.00	0	0	0	0	0	0	10.26	20.62	35.88	31.78
2014 Fayetteville NC	1.70	1	1.37	0.00	0.00	100.00	0.00	0	0	0	0	0	0	2.89	13.72	49.34	32.95
2014 Goldsboro NC	3.86	3	4.11	0.00	0.00	100.00	0.00	0	0	0	0	0	0	2.30	12.47	62.71	22.52
2014 Greensboro-High Point NC MSA	16.62	10	13.70	10.00	40.00	50.00	0.00	0	0	0	0	0	0	6.16	23.07	42.77	28.00
2014 Greenville NC	1.93	1	1.37	0.00	0.00	0.00	100.00	0	0	0	0	0	0	5.27	19.33	39.91	35.50
2014 Hickory-Lenoir-Morganton NC MSA	7.27	4	5.48	0.00	25.00	50.00	25.00	0	0	0	0	0	0	0.00	17.16	61.86	20.97

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

DISTRIBUTION OF BRANCH DELIVERY SYSTEM AND BRANCH OPENINGS/CLOSINGS																	
Geography: NORTH CAROLINA Evaluation Period: JANUARY 1, 2014 TO JUNE 30, 2015																	
MA/Assessment Area:	Deposits	Branches						Branch Openings/Closings						Population			
	% of Rated Area Deposits in AA	# of BANK Branches	% of Rated Area Branches in AA	Location of Branches by Income of Geographies (%)				# of Branch Openings	# of Branch Closings	Net change in Location of Branches (+ or -)				% of Population within Each Geography			
				Low	Mod	Mid	Upp			Low	Mod	Mid	Upp	Low	Mod	Mid	Upp
<b>Limited Review:</b>																	
2014 Jacksonville NC	1.19	1	1.37	0.00	0.00	100.00	0.00	0	0	0	0	0	0	0.00	8.36	63.06	21.72
2014 New Bern NC	2.39	2	2.74	0.00	0.00	50.00	50.00	0	0	0	0	0	0	4.91	22.43	39.00	33.66
2014 Northern Non-MSA	2.98	3	4.11	0.00	0.00	100.00	0.00	0	0	0	0	0	0	3.40	35.15	54.60	6.85
2014 Pasquotank County	1.39	1	1.37	0.00	0.00	0.00	100.00	0	0	0	0	0	0	7.28	0.00	41.88	50.83
2014 Raleigh NC MSA	13.51	11	15.06	0.00	45.45	45.45	9.10	0	0	0	0	0	0	6.12	27.04	36.50	29.97
2014 Rocky Mount NC	3.02	3	4.11	0.00	100.00	0.00	0.00	0	0	0	0	0	0	0.00	17.34	56.27	26.39
2014 South Central Non-MSA NC	8.28	7	9.59	0.00	28.57	42.86	28.57	0	0	0	0	0	0	3.34	23.01	45.95	27.70
2014 Surry and Wilkes Counties NC	2.08	2	2.74	0.00	0.00	50.00	50.00	0	0	0	0	0	0	0.00	10.60	76.57	12.83

Ohio

**Table 1. Lending Volume**

LENDING VOLUME		Geography: OHIO				Evaluation Period: JANUARY 1, 2014 TO JUNE 30, 2015						
Assessment Area (2014):	% of Rated Area Loans (#) in MA/AA*	Home Mortgage		Small Loans to Businesses		Small Loans to Farms		Community Development Loans**		Total Reported Loans		% of Rated Area Deposits in MA/AA***
		#	\$ (000's)	#	\$ (000's)	#	\$ (000's)	#	\$ (000's)	#	\$ (000's)	
<b>Full Review:</b>												
2014 Toledo OH MSA	7.10	40	3,266	22	56	0	0	2	150	64	3,472	9.61
<b>Limited Review:</b>												
2014 Akron OH MSA	5.54	36	3,056	13	25	0	0	1	10	50	3,091	5.02
2014 Canton-Massillon OH MSA	4.55	37	3,435	1	1	0	0	3	35	41	3,471	3.31
2014 Central Non-MSA OH	8.31	42	3,027	32	181	0	0	1	15	75	3,223	18.61
2014 Cleveland-Elyria OH MSA	9.42	60	6,324	23	48	0	0	2	100	85	6,472	9.80
2014 Columbiana County OH	5.88	47	4,124	5	11	0	0	1	10	53	4,145	4.26
2014 Columbus OH MSA	8.65	48	4,528	29	602	0	0	1	60	78	5,190	7.46
2014 Dayton OH MSA	5.43	36	2,773	12	121	0	0	1	10	49	2,904	6.02
2014 Erie and Ottawa Counties OH	4.32	29	3,509	9	78	0	0	1	10	39	3,597	6.46
2014 Lima OH MSA	3.55	27	2,177	4	10	0	0	1	5	32	2,192	1.46
2014 Mansfield OH MSA	3.10	24	2,719	4	5	0	0	0	0	28	2,724	0.93
2014 Northwest Non-MSA OH	8.43	49	3,828	26	279	0	0	1	10	76	4,117	4.07
2014 Preble County OH	0.44	3	326	1	3	0	0	0	0	4	329	0.95

\* Loan Data as of June 30, 2015. Rated area refers to either state or multistate MA rating area.

\*\* The evaluation period for Community Development Loans is from January 01, 2014 to July 13, 2015.

\*\*\* Deposit Data as of July 08, 2015. Rated Area refers to either the state, multistate MA, or institution, as appropriate.

LENDING VOLUME		Geography: OHIO				Evaluation Period: JANUARY 1, 2014 TO JUNE 30, 2015						
Assessment Area (2014):	% of Rated Area Loans (#) in MA/AA*	Home Mortgage		Small Loans to Businesses		Small Loans to Farms		Community Development Loans**		Total Reported Loans		% of Rated Area Deposits in MA/AA***
		#	\$ (000's)	#	\$ (000's)	#	\$ (000's)	#	\$ (000's)	#	\$ (000's)	
<b>Limited Review:</b>												
2014 Southern Non-MSA	6.98	36	3,249	26	119	0	0	1	10	63	3,378	8.34
2014 Springfield OH MSA	3.10	27	3,120	1	1	0	0	0	0	28	3,121	1.38
2014 Western Non-MSA	4.55	36	2,788	4	6	0	0	1	65	41	2,859	6.18
2014 Wheeling OH MSA	4.55	38	4,327	2	6	0	0	1	5	41	4,338	2.96
2014 Youngstown-Warren-Boardman OH MSA	6.10	48	3,226	6	140	0	0	1	10	55	3,376	3.19

\* Loan Data as of June 30, 2015. Rated area refers to either state or multistate MA rating area.

\*\* The evaluation period for Community Development Loans is from January 01, 2014 to July 13, 2015.

\*\*\* Deposit Data as of June 30, 2014. Rated Area refers to either the state, multistate MA, or institution, as appropriate.

**Table 1. Other Products**

LENDING VOLUME		Geography: OHIO				Evaluation Period: JANUARY 1, 2014 TO JUNE 30, 2015								
Assessment Area (2014):	% of Rated Area Loans (#) in MA/AA*	Total Optional Loans**		Small Business Real Estate Secured**		Home Equity**		Motor Vehicle**		Credit Card**		Other Secured Consumer**		% of Rated Area Deposits in AA***
		#	\$ (000's)	#	\$ (000's)	#	\$ (000's)	#	\$ (000's)	#	\$ (000's)	#	\$ (000's)	
<b>Full Review:</b>														
2014 Toledo OH MSA	9.98	252	327	0	0	0	0	0	0	0	0	0	0	9.61
<b>Limited Review:</b>														
2014 Akron OH MSA	5.62	142	188	0	0	0	0	0	0	0	0	0	0	5.02
2014 Canton-Massillon	2.77	70	88	0	0	0	0	0	0	0	0	0	0	3.31
2014 Central Non-MSA	16.35	413	525	0	0	0	0	0	0	0	0	0	0	18.61
2014 Cleveland-Elyria OH	10.13	256	337	0	0	0	0	0	0	0	0	0	0	9.80
2014 Columbiana County	6.45	163	211	0	0	0	0	0	0	0	0	0	0	4.26
2014 Columbus OH MSA	7.84	198	267	0	0	0	0	0	0	0	0	0	0	7.46
2014 Dayton OH MSA	6.06	153	195	0	0	0	0	0	0	0	0	0	0	6.02
2014 Erie and Ottawa Counties OH	2.34	59	80	0	0	0	0	0	0	0	0	0	0	6.46
2014 Lima OH MSA	1.54	39	47	0	0	0	0	0	0	0	0	0	0	1.46
2014 Mansfield OH MSA	1.07	27	27	0	0	0	0	0	0	0	0	0	0	0.93
2014 Northwest Non-MSA	6.93	175	225	0	0	0	0	0	0	0	0	0	0	4.07
2014 Preble County OH	0.95	24	29	0	0	0	0	0	0	0	0	0	0	0.95
2014 Southern Non-MSA	8.83	223	284	0	0	0	0	0	0	0	0	0	0	8.34
2014 Springfield OH MSA	2.18	55	64	0	0	0	0	0	0	0	0	0	0	1.38
2014 Western Non-MSA	5.30	134	170	0	0	0	0	0	0	0	0	0	0	6.18
2014 Wheeling OH MSA	1.43	36	44	0	0	0	0	0	0	0	0	0	0	2.96
2014 Youngstown-Warren-Boardman OH	4.24	107	141	0	0	0	0	0	0	0	0	0	0	3.19

\* Loan Data as of June 30, 2015. Rated area refers to either state or multistate MA rating area.

\*\* The evaluation period for Optional Product Line(s) is from January 01, 2014 to June 30, 2015.

\*\*\* Deposit Data as of June 30, 2014. Rated Area refers to either the state, multistate MA, or institution, as appropriate.

**Table 1. Other Products**

LENDING VOLUME		Geography: OHIO		Evaluation Period: JANUARY 1, 2014 TO JUNE 30, 2015	
Assessment Area (2014):	Other Unsecured Consumer Loans <sup>1</sup>		Other Optional Loans*		
	#	\$ (000's)	#	\$ (000's)	
<b>Full Review:</b>					
2014 Toledo OH MSA	252	327	0	0	
<b>Limited Review:</b>					
2014 Akron OH MSA	142	188	0	0	
2014 Canton-Massillon OH MSA	70	88	0	0	
2014 Central Non-MSA	413	525	0	0	
2014 Cleveland-Elyria OH MSA	256	337	0	0	
2014 Columbiana County	163	211	0	0	
2014 Columbus OH MSA	198	267	0	0	
2014 Dayton OH MSA	153	195	0	0	
2014 Erie and Ottawa Counties OH	59	80	0	0	
2014 Lima OH MSA	39	47	0	0	
2014 Mansfield OH MSA	27	27	0	0	
2014 Northwest Non-MSA OH	175	225	0	0	
2014 Preble County OH	24	29	0	0	
2014 Southern Non-MSA OH	223	284	0	0	
2014 Springfield OH MSA	55	64	0	0	
2014 Western Non-MSA OH	134	170	0	0	
2014 Wheeling OH MSA	36	44	0	0	
2014 Youngstown-Warren-Boardman OH MSA	107	141	0	0	

\* The evaluation period for Optional Product Line(s) is from January 01, 2014 to June 30, 2015.

**Table 2. Geographic Distribution of Home Purchase Loans**

Geographic Distribution: HOME PURCHASE			Geography: OHIO				Evaluation Period: JANUARY 1, 2014 TO JUNE 30, 2015					Market Share (%) by Geography*				
Assessment Area:	Total Home Purchase Loans		Low-Income Geographies		Moderate-Income Geographies		Middle-Income Geographies		Upper-Income Geographies		Overall	Low	Mod	Mid	Upp	
	#	% of Total**	% Owner Occ Units***	% BANK Loans****	% Owner Occ Units***	% BANK Loans	% Owner Occ Units***	% BANK Loans	% Owner Occ Units***	% BANK Loans						
<b>Full Review:</b>																
2014 Toledo OH MSA	1	14.29	5.77	0.00	12.85	0.00	48.96	100.00	32.41	0.00	0.02	0.00	0.00	0.03	0.00	
<b>Limited Review:</b>																
2014 Akron OH MSA	0	0.00	4.58	0.00	18.89	0.00	42.20	0.00	34.33	0.00	0.00	0.00	0.00	0.00	0.00	
2014 Canton-Massillon OH	0	0.00	3.09	0.00	9.84	0.00	60.24	0.00	26.83	0.00	0.00	0.00	0.00	0.00	0.00	
2014 Central Non-MSA OH	0	0.00	0.36	0.00	12.71	0.00	72.60	0.00	14.33	0.00	0.00	0.00	0.00	0.00	0.00	
2014 Cleveland-Elyria OH MSA	0	0.00	5.68	0.00	13.81	0.00	41.98	0.00	38.53	0.00	0.00	0.00	0.00	0.00	0.00	
2014 Columbiana County OH	2	28.57	0.00	0.00	20.82	100.00	73.63	0.00	5.55	0.00	0.21	0.00	1.49	0.00	0.00	
2014 Columbus OH MSA	2	28.57	4.94	0.00	17.13	0.00	38.23	50.00	39.70	50.00	0.01	0.00	0.00	0.01	0.01	
2014 Dayton OH MSA	0	0.00	4.44	0.00	18.39	0.00	44.16	0.00	33.02	0.00	0.00	0.00	0.00	0.00	0.00	
2014 Erie and Ottawa Counties	0	0.00	0.00	0.00	3.71	0.00	42.58	0.00	53.71	0.00	0.00	0.00	0.00	0.00	0.00	
2014 Lima OH MSA	0	0.00	5.60	0.00	10.43	0.00	51.30	0.00	32.67	0.00	0.00	0.00	0.00	0.00	0.00	
2014 Mansfield OH MSA	0	0.00	0.00	0.00	20.04	0.00	49.63	0.00	30.33	0.00	0.00	0.00	0.00	0.00	0.00	
2014 Northwest Non-MSA OH	0	0.00	0.00	0.00	4.12	0.00	63.02	0.00	32.86	0.00	0.00	0.00	0.00	0.00	0.00	
2014 Preble County OH	0	0.00	0.00	0.00	4.37	0.00	81.29	0.00	14.33	0.00	0.00	0.00	0.00	0.00	0.00	
2014 Southern Non-MSA OH	1	14.29	2.01	0.00	18.81	0.00	72.08	100.00	7.09	0.00	0.04	0.00	0.00	0.05	0.00	
2014 Springfield OH MSA	0	0.00	4.94	0.00	12.97	0.00	44.52	0.00	37.57	0.00	0.00	0.00	0.00	0.00	0.00	
2014 Western Non-MSA OH	0	0.00	0.00	0.00	10.63	0.00	52.20	0.00	37.17	0.00	0.00	0.00	0.00	0.00	0.00	
2014 Wheeling OH MSA	0	0.00	2.55	0.00	13.21	0.00	67.51	0.00	16.73	0.00	0.00	0.00	0.00	0.00	0.00	
2014 Youngstown-Warren-Boardman OH MSA	1	14.29	5.33	0.00	13.31	0.00	55.54	0.00	25.82	100.00	0.00	0.00	0.00	0.00	0.00	

\* Based on 2014 Peer Mortgage Data – US and PR

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

\*\*\* Percentage of Owner Occupied Units is the number of owner occupied units in a particular geography divided by the number of owner occupied housing units in the area based on 2010 Census information.

\*\*\*\* Data shown includes only One to Four-family and manufactured housing. (Property type of 1 or 2)

**Table 3. Geographic Distribution of Home Improvement Loans**

Geographic Distribution: HOME IMPROVEMENT			Geography: OHIO				Evaluation Period: JANUARY 1, 2014 TO JUNE 30, 2015					Market Share (%) by Geography'				
Assessment Area:	Total Home Improvement Loans		Low-Income Geographies		Moderate-Income Geographies		Middle-Income Geographies		Upper-Income Geographies							
	#	% of Total**	% Owner Occ Units***	% BANK Loans****	% Owner Occ Units***	% BANK Loans	% Owner Occ Units***	% BANK Loans	% Owner Occ Units***	% BANK Loans	Overall	Low	Mod	Mid	Upp	
<b>Full Review:</b>																
2014 Toledo OH MSA	3	7.69	5.77	0.00	12.85	0.00	48.96	66.67	32.41	33.33	0.38	0.00	0.00	0.48	0.40	
<b>Limited Review:</b>																
2014 Akron OH MSA	2	5.13	4.58	0.00	18.89	50.00	42.20	50.00	34.33	0.00	0.32	0.00	0.78	0.37	0.00	
2014 Canton-Massillon OH	0	0.00	3.09	0.00	9.84	0.00	60.24	0.00	26.83	0.00	0.00	0.00	0.00	0.00	0.00	
2014 Central Non-MSA OH	8	20.51	0.36	0.00	12.71	25.00	72.60	75.00	14.33	0.00	0.50	0.00	1.08	0.51	0.00	
2014 Cleveland-Elyria OH MSA	3	7.69	5.68	0.00	13.81	33.33	41.98	66.67	38.53	0.00	0.12	0.00	0.29	0.20	0.00	
2014 Columbiana County OH	2	5.13	0.00	0.00	20.82	50.00	73.63	50.00	5.55	0.00	1.32	0.00	3.70	0.85	0.00	
2014 Columbus OH MSA	2	5.13	4.94	50.00	17.13	50.00	38.23	0.00	39.70	0.00	0.11	1.37	0.35	0.00	0.00	
2014 Dayton OH MSA	1	2.56	4.44	0.00	18.39	0.00	44.16	0.00	33.02	100.00	0.12	0.00	0.00	0.00	0.36	
2014 Erie and Ottawa Counties	2	5.13	0.00	0.00	3.71	0.00	42.58	0.00	53.71	100.00	1.05	0.00	0.00	0.00	1.69	
2014 Lima OH MSA	1	2.56	5.60	0.00	10.43	0.00	51.30	0.00	32.67	100.00	1.25	0.00	0.00	0.00	2.78	
2014 Mansfield OH MSA	2	5.13	0.00	0.00	20.04	0.00	49.63	100.00	30.33	0.00	0.53	0.00	0.00	1.08	0.00	
2014 Northwest Non-MSA OH	2	5.13	0.00	0.00	4.12	0.00	63.02	100.00	32.86	0.00	0.00	0.00	0.00	0.00	0.00	
2014 Preble County OH	0	0.00	0.00	0.00	4.37	0.00	81.29	0.00	14.33	0.00	0.00	0.00	0.00	0.00	0.00	

\* Based on 2014 Peer Mortgage Data – US and PR

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

\*\*\* Percentage of Owner Occupied Units is the number of owner occupied units in a particular geography divided by the number of owner occupied housing units in the area based on 2010 Census information.

\*\*\*\* Data shown includes only One to Four-family and manufactured housing. (Property type of 1 or 2)



**Table 3. Geographic Distribution of Home Improvement Loans**

Geographic Distribution: HOME IMPROVEMENT		Geography: OHIO					Evaluation Period: JANUARY 1, 2014 TO JUNE 30, 2015					Market Share (%) by Geography				
Assessment Area:	Total Home Improvement Loans		Low-Income Geographies		Moderate-Income Geographies		Middle-Income Geographies		Upper-Income Geographies							
	#	% of Total**	% Owner Occ Units***	% BANK Loans****	% Owner Occ Units***	% BANK Loans	% Owner Occ Units***	% BANK Loans	% Owner Occ Units***	% BANK Loans	Overall	Low	Mod	Mid	Upp	
<b>Limited Review:</b>																
2014 Southern Non-MSA	2	5.13	2.01	0.00	18.81	0.00	72.08	100.00	7.09	0.00	0.56	0.00	0.00	0.74	0.00	
2014 Springfield OH MSA	0	0.00	4.94	0.00	12.97	0.00	44.52	0.00	37.57	0.00	0.00	0.00	0.00	0.00	0.00	
2014 Western Non-MSA	2	5.13	0.00	0.00	10.63	50.00	52.20	50.00	37.17	0.00	0.94	0.00	5.88	0.94	0.00	
2014 Wheeling OH MSA	3	7.69	2.55	0.00	13.21	0.00	67.51	66.67	16.73	33.33	0.55	0.00	0.00	0.84	0.00	
2014 Youngstown-Warren-Boardman OH	4	10.26	5.33	0.00	13.31	0.00	55.54	100.00	25.82	0.00	0.42	0.00	0.00	0.74	0.00	

\* Based on 2014 Peer Mortgage Data – US and PR

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

\*\*\* Percentage of Owner Occupied Units is the number of owner occupied units in a particular geography divided by the number of owner occupied housing units in the area based on 2010 Census information.

\*\*\*\* Data shown includes only One to Four-family and manufactured housing. (Property type of 1 or 2)

**Table 4. Geographic Distribution of Home Mortgage Refinance Loans**

Geographic Distribution: HOME MORTGAGE REFINANCE			Geography: OHIO				Evaluation Period: JANUARY 1, 2014 TO JUNE 30, 2015					Market Share (%) by Geography'				
Assessment Area:	Total Home Mortgage Refinance Loans		Low-Income Geographies		Moderate-Income Geographies		Middle-Income Geographies		Upper-Income Geographies		Overall	Low	Mod	Mid	Upp	
	#	% of Total**	% Owner Occ Units***	% BANK Loans****	% Owner Occ Units***	% BANK Loans	% Owner Occ Units***	% BANK Loans	% Owner Occ Units***	% BANK Loans						
<b>Full Review:</b>																
2014 Toledo OH MSA	36	5.83	5.77	5.56	12.85	11.11	48.96	50.00	32.41	33.33	0.66	1.45	1.09	0.70	0.48	
<b>Limited Review:</b>																
2014 Akron OH MSA	34	5.51	4.58	2.94	18.89	29.41	42.20	50.00	34.33	17.65	0.56	0.75	1.20	0.64	0.24	
2014 Canton-Massillon OH	37	6.00	3.09	2.70	9.84	13.51	60.24	54.05	26.83	29.73	0.98	2.17	1.75	0.89	0.96	
2014 Central Non-MSA OH	34	5.51	0.36	0.00	12.71	26.47	72.60	64.71	14.33	8.82	0.74	0.00	1.67	0.68	0.39	
2014 Cleveland-Elyria OH MSA	57	9.24	5.68	7.02	13.81	17.54	41.98	42.11	38.53	33.33	0.26	0.00	0.64	0.31	0.15	
2014 Columbiana County OH	43	6.97	0.00	0.00	20.82	27.91	73.63	69.77	5.55	2.33	3.97	0.00	7.97	3.28	0.00	
2014 Columbus OH MSA	44	7.13	4.94	13.64	17.13	25.00	38.23	38.64	39.70	22.73	0.24	1.00	0.43	0.25	0.12	
2014 Dayton OH MSA	35	5.67	4.44	2.86	18.39	40.00	44.16	45.71	33.02	11.43	0.48	0.63	1.29	0.49	0.14	
2014 Erie and Ottawa Counties	27	4.38	0.00	0.00	3.71	0.00	42.58	29.63	53.71	70.37	1.30	0.00	0.00	1.73	1.10	
2014 Lima OH MSA	26	4.21	5.60	3.85	10.43	19.23	51.30	53.85	32.67	23.08	2.62	4.35	8.89	2.13	1.98	
2014 Mansfield OH MSA	22	3.57	0.00	0.00	20.04	4.55	49.63	54.55	30.33	40.91	0.87	0.00	0.00	1.00	0.98	
2014 Northwest Non-MSA OH	47	7.62	0.00	0.00	4.12	12.77	63.02	65.96	32.86	21.28	2.77	0.00	10.00	2.80	1.67	
2014 Preble County OH	3	0.49	0.00	0.00	4.37	0.00	81.29	0.00	14.33	100.00	0.76	0.00	0.00	0.00	4.00	

\* Based on 2014 Peer Mortgage Data – US and PR

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

\*\*\* Percentage of Owner Occupied Units is the number of owner occupied units in a particular geography divided by the number of owner occupied housing units in the area based on 2010 Census information.

\*\*\*\* Data shown includes only One to Four-family and manufactured housing. (Property type of 1 or 2)

**Table 4. Geographic Distribution of Home Mortgage Refinance Loans**

Geographic Distribution: HOME MORTGAGE REFINANCE			Geography: OHIO				Evaluation Period: JANUARY 1, 2014 TO JUNE 30, 2015					Market Share (%) by Geography				
Assessment Area:	Total Home Mortgage Refinance Loans		Low-Income Geographies		Moderate-Income Geographies		Middle-Income Geographies		Upper-Income Geographies		Overall	Low	Mod	Mid	Upp	
	#	% of Total**	% Owner Occ Units***	% BANK Loans****	% Owner Occ Units***	% BANK Loans	% Owner Occ Units***	% BANK Loans	% Owner Occ Units***	% BANK Loans						
<b>Limited Review:</b>																
2014 Southern Non-MSA	33	5.35	2.01	0.00	18.81	15.15	72.08	78.79	7.09	6.06	1.48	0.00	2.07	1.44	1.16	
2014 Springfield OH MSA	27	4.38	4.94	7.41	12.97	3.70	44.52	40.74	37.57	48.15	1.21	0.00	0.79	0.78	1.83	
2014 Western Non-MSA	34	5.51	0.00	0.00	10.63	20.59	52.20	55.88	37.17	23.53	1.29	0.00	4.40	1.08	0.85	
2014 Wheeling OH MSA	35	5.67	2.55	0.00	13.21	8.57	67.51	71.43	16.73	20.00	3.15	0.00	4.35	3.18	2.86	
2014 Youngstown-Warren-Boardman OH	43	6.97	5.33	6.98	13.31	16.28	55.54	58.14	25.82	18.60	1.01	1.43	1.82	1.04	0.71	

\* Based on 2014 Peer Mortgage Data – US and PR

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

\*\*\* Percentage of Owner Occupied Units is the number of owner occupied units in a particular geography divided by the number of owner occupied housing units in the area based on 2010 Census information.

\*\*\*\* Data shown includes only One to Four-family and manufactured housing. (Property type of 1 or 2)

**Table 6. Geographic Distribution of Small Loans to Businesses**

Geographic Distribution: SMALL LOANS TO BUSINESSES			Geography: OHIO				Evaluation Period: JANUARY 1, 2014 TO JUNE 30, 2015					Market Share (%) by Geography <sup>1</sup>				
Assessment Area:	Total Small Business Loans		Low-Income Geographies		Moderate-Income Geographies		Middle-Income Geographies		Upper-Income Geographies		Overall	Low	Mod	Mid	Upp	
	#	% of Total <sup>**</sup>	% of Businesses <sup>***</sup>	% BANK Loans	% of Businesses <sup>***</sup>	% BANK Loans	% of Businesses <sup>***</sup>	% BANK Loans	% of Businesses <sup>***</sup>	% BANK Loans						
<b>Full Review:</b>																
2014 Toledo OH MSA	22	10.00	6.36	0.00	13.94	22.73	45.13	59.09	34.49	18.18	0.17	0.00	0.13	0.28	0.07	
<b>Limited Review:</b>																
2014 Akron OH MSA	13	5.91	7.51	0.00	16.09	15.38	35.89	38.46	40.52	46.15	0.10	0.00	0.07	0.12	0.12	
2014 Canton-Massillon OH	1	0.45	6.41	100.00	9.42	0.00	52.96	0.00	31.20	0.00	0.02	0.37	0.00	0.00	0.00	
2014 Central Non-MSA OH	32	14.55	0.45	0.00	15.90	15.63	69.95	62.50	13.70	21.88	0.14	0.00	0.15	0.12	0.30	
2014 Cleveland-Elyria OH	23	10.45	7.57	26.09	13.13	13.04	38.38	52.17	40.56	8.70	0.05	0.25	0.05	0.05	0.01	
2014 Columbiana County	5	2.27	0.00	0.00	17.10	40.00	75.95	60.00	6.94	0.00	0.24	0.00	0.63	0.21	0.00	
2014 Columbus OH MSA	29	13.18	8.18	13.79	18.74	31.03	32.89	34.48	39.88	20.69	0.05	0.16	0.06	0.06	0.03	
2014 Dayton OH MSA	12	5.45	6.41	8.33	18.26	50.00	41.95	33.33	33.34	8.33	0.06	0.00	0.16	0.05	0.03	
2014 Erie and Ottawa Counties OH	9	4.09	0.00	0.00	6.92	0.00	41.48	33.33	51.60	66.67	0.46	0.00	0.00	0.49	0.51	
2014 Lima OH MSA	4	1.82	14.55	50.00	11.06	0.00	48.18	0.00	26.22	50.00	0.35	1.35	0.00	0.00	0.57	
2014 Mansfield OH MSA	4	1.82	0.00	0.00	27.01	25.00	45.48	50.00	27.50	25.00	0.13	0.00	0.27	0.15	0.00	
2014 Northwest Non-MSA	26	11.82	0.00	0.00	5.15	7.69	61.10	65.38	33.75	26.92	0.69	0.00	0.00	0.92	0.46	
2014 Preble County OH	1	0.45	0.00	0.00	8.15	0.00	79.53	100.00	12.32	0.00	0.20	0.00	0.00	0.24	0.00	

\* Based on 2014 Peer Small Business Data – US and PR

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

\*\*\* Source Data - Dun and Bradstreet (2014).

**Table 6. Geographic Distribution of Small Loans to Businesses**

Geographic Distribution: SMALL LOANS TO BUSINESSES			Geography: OHIO				Evaluation Period: JANUARY 1, 2014 TO JUNE 30, 2015					Market Share (%) by Geography*				
Assessment Area:	Total Small Business Loans		Low-Income Geographies		Moderate-Income Geographies		Middle-Income Geographies		Upper-Income Geographies		Overall	Low	Mod	Mid	Upp	
	#	% of Total**	% of Businesses***	% BANK Loans	% of Businesses***	% BANK Loans	% of Businesses***	% BANK Loans	% of Businesses***	% BANK Loans						
<b>Limited Review:</b>																
2014 Southern Non-MSA OH	26	11.82	5.04	7.69	22.52	23.08	66.21	65.38	6.23	3.85	0.73	1.30	0.82	0.76	0.00	
2014 Springfield OH	1	0.45	8.03	0.00	17.30	100.00	34.57	0.00	40.10	0.00	0.00	0.00	0.00	0.00	0.00	
2014 Western Non-MSA	4	1.82	0.00	0.00	16.67	0.00	50.11	50.00	33.22	50.00	0.13	0.00	0.00	0.09	0.24	
2014 Wheeling OH	2	0.91	6.17	0.00	12.35	0.00	53.24	50.00	28.24	50.00	0.12	0.00	0.00	0.00	0.38	
2014 Youngstown-Warren-Boardman OH MSA	6	2.73	7.99	16.67	12.00	16.67	47.92	33.33	32.10	33.33	0.07	0.00	0.16	0.04	0.10	

\* Based on 2014 Peer Small Business Data – US and PR

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

\*\*\* Source Data - Dun and Bradstreet (2014).

**Table 7. Geographic Distribution of Small Loans to Farms**

Geographic Distribution: SMALL LOANS TO FARMS			Geography: OHIO				Evaluation Period: JANUARY 1, 2014 TO JUNE 30, 2015					Market Share (%) by Geography				
Assessment Area:	Total Small Farm Loans		Low-Income Geographies		Moderate-Income Geographies		Middle-Income Geographies		Upper-Income Geographies		Overall	Low	Mod	Mid	Upp	
	#	% of Total**	% of Farms***	% BANK Loans	% of Farms***	% BANK Loans	% of Farms***	% BANK Loans	% of Farms***	% BANK Loans						
<b>Full Review:</b>																
2014 Toledo OH MSA	0	0.00	1.70	0.00	4.21	0.00	64.03	0.00	30.06	0.00	0.00	0.00	0.00	0.00	0.00	
<b>Limited Review:</b>																
2014 Akron OH MSA	0	0.00	1.59	0.00	12.66	0.00	51.38	0.00	34.37	0.00	0.00	0.00	0.00	0.00	0.00	
2014 Canton-Massillon OH MSA	0	0.00	1.11	0.00	6.17	0.00	70.12	0.00	22.61	0.00	0.00	0.00	0.00	0.00	0.00	
2014 Central Non-MSA OH	0	0.00	0.02	0.00	4.99	0.00	77.92	0.00	17.07	0.00	0.00	0.00	0.00	0.00	0.00	
2014 Cleveland-Elyria OH MSA	0	0.00	2.59	0.00	7.73	0.00	44.16	0.00	45.49	0.00	0.00	0.00	0.00	0.00	0.00	
2014 Columbiana County	0	0.00	0.00	0.00	17.60	0.00	79.09	0.00	3.31	0.00	0.00	0.00	0.00	0.00	0.00	
2014 Columbus OH MSA	0	0.00	2.90	0.00	12.76	0.00	50.35	0.00	33.97	0.00	0.00	0.00	0.00	0.00	0.00	
2014 Dayton OH MSA	0	0.00	2.20	0.00	10.43	0.00	56.03	0.00	31.34	0.00	0.00	0.00	0.00	0.00	0.00	
2014 Erie and Ottawa Counties OH	0	0.00	0.00	0.00	0.90	0.00	31.95	0.00	67.15	0.00	0.00	0.00	0.00	0.00	0.00	
2014 Lima OH MSA	0	0.00	1.57	0.00	1.17	0.00	78.28	0.00	18.98	0.00	0.00	0.00	0.00	0.00	0.00	
2014 Mansfield OH MSA	0	0.00	0.00	0.00	7.08	0.00	59.07	0.00	33.85	0.00	0.00	0.00	0.00	0.00	0.00	
2014 Northwest Non-MSA	0	0.00	0.00	0.00	0.67	0.00	61.67	0.00	37.65	0.00	0.00	0.00	0.00	0.00	0.00	
2014 Preble County OH	0	0.00	0.00	0.00	0.70	0.00	85.55	0.00	13.75	0.00	0.00	0.00	0.00	0.00	0.00	

\* Based on 2014 Peer Small Business Data – US and PR

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

\*\*\* Source Data - Dun and Bradstreet (2014).

**Table 7. Geographic Distribution of Small Loans to Farms**

Geographic Distribution: SMALL LOANS TO FARMS															Geography: OHIO					Evaluation Period: JANUARY 1, 2014 TO JUNE 30, 2015				
Assessment Area:	Total Small Farm Loans		Low-Income Geographies		Moderate-Income Geographies		Middle-Income Geographies		Upper-Income Geographies		Market Share (%) by Geography*													
	#	% of Total**	% of Farms***	% BANK Loans	% of Farms***	% BANK Loans	% of Farms***	% BANK Loans	% of Farms***	% BANK Loans	% of Farms***	% BANK Loans	Overall	Low	Mod	Mid	Upp							
<b>Limited Review:</b>																								
2014 Southern Non-MSA OH	0	0.00	0.35	0.00	13.49	0.00	77.86	0.00	8.30	0.00	0.00	0.00	0.00	0.00	0.00	0.00								
2014 Springfield OH MSA	0	0.00	2.67	0.00	5.54	0.00	33.06	0.00	58.73	0.00	0.00	0.00	0.00	0.00	0.00	0.00								
2014 Western Non-MSA OH	0	0.00	0.00	0.00	2.98	0.00	50.85	0.00	46.17	0.00	0.00	0.00	0.00	0.00	0.00	0.00								
2014 Wheeling OH MSA	0	0.00	0.00	0.00	2.88	0.00	77.78	0.00	19.34	0.00	0.00	0.00	0.00	0.00	0.00	0.00								
2014 Youngstown-Warren-Boardman OH MSA	0	0.00	2.07	0.00	5.59	0.00	66.18	0.00	26.16	0.00	0.00	0.00	0.00	0.00	0.00	0.00								

\* Based on 2014 Peer Small Business Data – US and PR

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

\*\*\* Source Data - Dun and Bradstreet (2014).

**Table 8. Borrower Distribution of Home Purchase Loans**

Borrower Distribution: HOME PURCHASE		Geography: OHIO					Evaluation Period: JANUARY 1, 2014 TO JUNE 30, 2015					Market Share <sup>1</sup>				
Assessment Area:	Total Home Purchase Loans		Low-Income Borrowers		Moderate-Income Borrowers		Middle-Income Borrowers		Upper-Income Borrowers		Overall	Low	Mod	Mid	Upp	
	#	% of Total <sup>2</sup>	% Families <sup>3</sup>	% BANK Loans <sup>4</sup>	% Families <sup>36</sup>	% BANK Loans <sup>4</sup>	% Families <sup>3</sup>	% BANK Loans <sup>4</sup>	% Families <sup>3</sup>	% BANK Loans <sup>4</sup>						
<b>Full Review:</b>																
2014 Toledo OH MSA	1	14.29	21.88	100.00	16.99	0.00	20.48	0.00	40.65	0.00	0.02	0.19	0.00	0.00	0.00	
<b>Limited Review:</b>																
2014 Akron OH MSA	0	0.00	20.77	0.00	17.80	0.00	22.01	0.00	39.42	0.00	0.00	0.00	0.00	0.00	0.00	
2014 Canton-Massillon	0	0.00	19.27	0.00	19.02	0.00	21.68	0.00	40.03	0.00	0.00	0.00	0.00	0.00	0.00	
2014 Central Non-MSA	0	0.00	18.36	0.00	18.69	0.00	22.71	0.00	40.23	0.00	0.00	0.00	0.00	0.00	0.00	
2014 Cleveland-Elyria	0	0.00	21.71	0.00	17.29	0.00	20.69	0.00	40.30	0.00	0.00	0.00	0.00	0.00	0.00	
2014 Columbiana County	2	28.57	22.02	0.00	20.59	0.00	21.02	100.00	36.36	0.00	0.26	0.00	0.00	0.96	0.00	
2014 Columbus OH MSA	2	28.57	20.98	0.00	17.07	50.00	20.60	50.00	41.35	0.00	0.01	0.00	0.03	0.00	0.00	
2014 Dayton OH MSA	0	0.00	20.98	0.00	18.16	0.00	20.62	0.00	40.24	0.00	0.00	0.00	0.00	0.00	0.00	
2014 Erie and Ottawa Counties	0	0.00	14.48	0.00	15.78	0.00	19.99	0.00	49.75	0.00	0.00	0.00	0.00	0.00	0.00	
2014 Lima OH MSA	0	0.00	21.47	0.00	17.45	0.00	22.40	0.00	38.69	0.00	0.00	0.00	0.00	0.00	0.00	
2014 Mansfield OH MSA	0	0.00	18.37	0.00	20.51	0.00	21.55	0.00	39.57	0.00	0.00	0.00	0.00	0.00	0.00	
2014 Northwest Non-MSA	0	0.00	14.81	0.00	17.36	0.00	23.33	0.00	44.50	0.00	0.00	0.00	0.00	0.00	0.00	
2014 Preble County OH	0	0.00	13.94	0.00	16.17	0.00	26.45	0.00	43.44	0.00	0.00	0.00	0.00	0.00	0.00	

\* Based on 2014 Peer Mortgage Data – US and PR.

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

\*\*\* Percentage of Families is based on the 2010 Census information.

\*\*\*\* As a percentage of loans with borrower income information available. No information was available for 0.0% of loans originated and purchased by bank.

36 Data shown includes only One to Four-family and manufactured housing. (Property type of 1 or 2)



**Table 8. Borrower Distribution of Home Purchase Loans**

Borrower Distribution: HOME PURCHASE		Geography: OHIO					Evaluation Period: JANUARY 1, 2014 TO JUNE 30, 2015					Market Share <sup>1</sup>				
Assessment Area:	Total Home Purchase Loans		Low-Income Borrowers		Moderate-Income Borrowers		Middle-Income Borrowers		Upper-Income Borrowers		Overall	Low	Mod	Mid	Upp	
	#	% of Total <sup>**</sup>	% Families <sup>***</sup>	% BANK Loans <sup>****</sup>	% Families <sup>37</sup>	% BANK Loans <sup>****</sup>	% Families <sup>***</sup>	% BANK Loans <sup>****</sup>	% Families <sup>***</sup>	% BANK Loans <sup>****</sup>						
<b>Limited Review:</b>																
2014 Southern Non-MSA OH	1	14.29	25.24	0.00	18.69	100.00	20.64	0.00	35.43	0.00	0.00	0.04	0.00	0.16	0.00	
2014 Springfield OH	0	0.00	19.82	0.00	17.52	0.00	22.90	0.00	39.76	0.00	0.00	0.00	0.00	0.00	0.00	
2014 Western Non-MSA	0	0.00	16.14	0.00	16.18	0.00	23.01	0.00	44.67	0.00	0.00	0.00	0.00	0.00	0.00	
2014 Wheeling OH MSA	0	0.00	19.91	0.00	20.36	0.00	21.44	0.00	38.29	0.00	0.00	0.00	0.00	0.00	0.00	
2014 Youngstown-Warren-Boardman OH	1	14.29	20.65	0.00	17.85	100.00	22.02	0.00	39.48	0.00	0.00	0.00	0.00	0.00	0.00	

\* Based on 2014 Peer Mortgage Data – US and PR

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

\*\*\* Percentage of Families is based on the 2010 Census information.

\*\*\*\* As a percentage of loans with borrower income information available. No information was available for 0.0% of loans originated and purchased by bank.

37 Data shown includes only One to Four-family and manufactured housing. (Property type of 1 or 2)

**Table 9. Borrower Distribution of Home Improvement Loans**

Borrower Distribution: HOME IMPROVEMENT		Geography: OHIO					Evaluation Period: JANUARY 1, 2014 TO JUNE 30, 2015					Market Share <sup>*</sup>				
Assessment Area:	Total Home Improvement Loans		Low-Income Borrowers		Moderate-Income Borrowers		Middle-Income Borrowers		Upper-Income Borrowers		Overall	Low	Mod	Mid	Upp	
	#	% of Total <sup>**</sup>	% Families <sup>***</sup>	% BANK Loans <sup>****</sup>	% Families <sup>38</sup>	% BANK Loans <sup>****</sup>	% Families <sup>***</sup>	% BANK Loans <sup>****</sup>	% Families <sup>***</sup>	% BANK Loans <sup>****</sup>						
<b>Full Review:</b>																
2014 Toledo OH MSA	3	7.69	21.88	66.67	16.99	33.33	20.48	0.00	40.65	0.00	0.40	1.80	0.58	0.00	0.00	
<b>Limited Review:</b>																
2014 Akron OH MSA	2	5.13	20.77	50.00	17.80	50.00	22.01	0.00	39.42	0.00	0.35	1.45	0.79	0.00	0.00	
2014 Canton-Massillon OH MSA	0	0.00	19.27	0.00	19.02	0.00	21.68	0.00	40.03	0.00	0.00	0.00	0.00	0.00	0.00	
2014 Central Non-MSA OH	8	20.51	18.36	71.43	18.69	14.29	22.71	14.29	40.23	0.00	0.52	5.06	0.00	0.00	0.00	
2014 Cleveland-Elyria OH MSA	3	7.69	21.71	0.00	17.29	66.67	20.69	33.33	40.30	0.00	0.13	0.00	0.42	0.18	0.00	
2014 Columbiana County OH	2	5.13	22.02	0.00	20.59	50.00	21.02	0.00	36.36	50.00	1.37	0.00	3.33	0.00	1.43	
2014 Columbus OH MSA	2	5.13	20.98	50.00	17.07	50.00	20.60	0.00	41.35	0.00	0.11	0.48	0.28	0.00	0.00	
2014 Dayton OH MSA	1	2.56	20.98	0.00	18.16	100.00	20.62	0.00	40.24	0.00	0.14	0.00	0.78	0.00	0.00	
2014 Erie and Ottawa Counties OH	2	5.13	14.48	0.00	15.78	50.00	19.99	0.00	49.75	50.00	1.10	0.00	3.23	0.00	1.19	
2014 Lima OH MSA	1	2.56	21.47	0.00	17.45	0.00	22.40	0.00	38.69	100.00	1.32	0.00	0.00	0.00	2.56	
2014 Mansfield OH MSA	2	5.13	18.37	0.00	20.51	0.00	21.55	0.00	39.57	100.00	0.56	0.00	0.00	0.00	1.33	
2014 Northwest Non-MSA OH	2	5.13	14.81	50.00	17.36	0.00	23.33	50.00	44.50	0.00	0.00	0.00	0.00	0.00	0.00	
2014 Preble County OH	0	0.00	13.94	0.00	16.17	0.00	26.45	0.00	43.44	0.00	0.00	0.00	0.00	0.00	0.00	
2014 Southern Non-MSA	2	5.13	25.24	50.00	18.69	50.00	20.64	0.00	35.43	0.00	0.58	1.82	1.15	0.00	0.00	
2014 Springfield OH	0	0.00	19.82	0.00	17.52	0.00	22.90	0.00	39.76	0.00	0.00	0.00	0.00	0.00	0.00	
2014 Western Non-MSA	2	5.13	16.14	0.00	16.18	50.00	23.01	0.00	44.67	50.00	0.99	0.00	2.17	0.00	1.10	
2014 Wheeling OH MSA	3	7.69	19.91	0.00	20.36	33.33	21.44	0.00	38.29	66.67	0.58	0.00	2.56	0.00	0.00	
2014 Youngstown-Warren-Boardman OH	4	10.26	20.65	25.00	17.85	75.00	22.02	0.00	39.48	0.00	0.44	0.00	2.10	0.00	0.00	

\* Based on 2014 Peer Mortgage Data – US and PR

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

\*\*\* Percentage of Families is based on the 2010 Census information.

\*\*\*\* As a percentage of loans with borrower income information available. No information was available for 2.6% of loans originated and purchased by bank.

38 Data shown includes only One to Four-family and manufactured housing. (Property type of 1 or 2)

**Table 10. Borrower Distribution of Home Mortgage Refinance Loans**

Borrower Distribution: HOME MORTGAGE REFINANCE			Geography: OHIO				Evaluation Period: JANUARY 1, 2014 TO JUNE 30, 2015					Market Share <sup>7</sup>				
Assessment Area:	Total Home Mortgage Refinance Loans		Low-Income Borrowers		Moderate-Income Borrowers		Middle-Income Borrowers		Upper-Income Borrowers		Overall	Low	Mod	Mid	Upp	
	#	% of Total <sup>**</sup>	% Families <sup>***</sup>	% BANK Loans <sup>****</sup>	% Families <sup>39</sup>	% BANK Loans <sup>****</sup>	% Families <sup>***</sup>	% BANK Loans <sup>****</sup>	% Families <sup>***</sup>	% BANK Loans <sup>****</sup>						
<b>Full Review:</b>																
2014 Toledo OH MSA	36	5.83	21.88	22.22	16.99	38.89	20.48	19.44	40.65	19.44	0.75	2.17	1.60	0.39	0.31	
<b>Limited Review:</b>																
2014 Akron OH MSA	34	5.51	20.77	23.53	17.80	41.18	22.01	11.76	39.42	23.53	0.65	1.69	1.37	0.37	0.32	
2014 Canton-Massillon	37	6.00	19.27	27.03	19.02	45.95	21.68	0.00	40.03	27.03	1.12	3.41	2.47	0.00	0.74	
2014 Central Non-MSA	34	5.51	18.36	20.59	18.69	38.24	22.71	26.47	40.23	14.71	0.84	2.27	1.33	0.93	0.19	
2014 Cleveland-Elyria	57	9.24	21.71	24.56	17.29	29.82	20.69	14.04	40.30	31.58	0.31	1.19	0.68	0.14	0.12	
2014 Columbiana County	43	6.97	22.02	6.98	20.59	23.26	21.02	18.60	36.36	51.16	4.39	3.17	5.80	3.65	4.48	
2014 Columbus OH MSA	44	7.13	20.98	27.27	17.07	31.82	20.60	22.73	41.35	18.18	0.30	0.96	0.51	0.26	0.12	
2014 Dayton OH MSA	35	5.67	20.98	34.29	18.16	28.57	20.62	17.14	40.24	20.00	0.59	2.11	0.85	0.41	0.26	
2014 Erie and Ottawa Counties OH	27	4.38	14.48	7.41	15.78	29.63	19.99	18.52	49.75	44.44	1.47	2.17	2.87	1.19	1.04	
2014 Lima OH MSA	26	4.21	21.47	11.54	17.45	34.62	22.40	26.92	38.69	26.92	2.95	5.77	3.08	3.09	2.15	
2014 Mansfield OH MSA	22	3.57	18.37	0.00	20.51	27.27	21.55	27.27	39.57	45.45	1.02	0.00	2.24	1.07	0.66	
2014 Northwest Non-MSA OH	47	7.62	14.81	10.64	17.36	42.55	23.33	25.53	44.50	21.28	3.09	6.06	6.18	3.08	0.46	
2014 Preble County OH	3	0.49	13.94	0.00	16.17	33.33	26.45	0.00	43.44	66.67	0.87	0.00	1.32	0.00	1.25	

\* Based on 2014 Peer Mortgage Data – US and PR

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

\*\*\* Percentage of Families is based on the 2010 Census information.

\*\*\*\* As a percentage of loans with borrower income information available. No information was available for 0.0% of loans originated and purchased by bank.

39 Data shown includes only One to Four-family and manufactured housing. (Property type of 1 or 2)

**Table 10. Borrower Distribution of Home Mortgage Refinance Loans**

Borrower Distribution: HOME MORTGAGE REFINANCE															Geography: OHIO					Evaluation Period: JANUARY 1, 2014 TO JUNE 30, 2015				
Assessment Area:	Total Home Mortgage Refinance Loans		Low-Income Borrowers		Moderate-Income Borrowers		Middle-Income Borrowers		Upper-Income Borrowers		Market Share <sup>1</sup>													
	#	% of Total <sup>**</sup>	% Families <sup>***</sup>	% BANK Loans <sup>****</sup>	% Families <sup>40</sup>	% BANK Loans <sup>****</sup>	% Families <sup>***</sup>	% BANK Loans <sup>****</sup>	% Families <sup>***</sup>	% BANK Loans <sup>****</sup>	Overall	Low	Mod	Mid	Upp									
<b>Limited Review:</b>																								
2014 Southern Non-MSA	33	5.35	25.24	24.24	18.69	21.21	20.64	18.18	35.43	36.36	1.70	4.00	1.89	1.14	1.38									
2014 Springfield OH	27	4.38	19.82	7.41	17.52	44.44	22.90	11.11	39.76	37.04	1.46	1.22	3.93	0.39	1.14									
2014 Western Non-MSA OH	34	5.51	16.14	20.59	16.18	50.00	23.01	11.76	44.67	17.65	1.47	5.69	3.56	0.23	0.60									
2014 Wheeling OH	35	5.67	19.91	5.71	20.36	11.43	21.44	20.00	38.29	62.86	3.78	10.00	4.35	0.96	3.82									
2014 Youngstown-Warren-Boardman OH MSA	43	6.97	20.65	41.86	17.85	32.56	22.02	9.30	39.48	16.28	1.18	5.16	2.23	0.14	0.49									

\* Based on 2014 Peer Mortgage Data – US and PR

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

\*\*\* Percentage of Families is based on the 2010 Census information.

\*\*\*\* As a percentage of loans with borrower income information available. No information was available for 0.0% of loans originated and purchased by bank.

40 Data shown includes only One to Four-family and manufactured housing. (Property type of 1 or 2)

**Table 11. Borrower Distribution of Small Loans to Businesses**

Borrower Distribution: SMALL LOANS TO BUSINESSES		Geography: OHIO			Evaluation Period: JANUARY 1, 2014 TO JUNE 30, 2015				
Assessment Area:	Total Small Loans to Businesses		Businesses With Revenues of \$1 million or less		Loans by Original Amount Regardless of Business Size			Market Share <sup>1</sup>	
	#	% of Total <sup>2</sup>	% of Businesses <sup>3</sup>	% BANK Loans <sup>4</sup>	\$100,000 or less	>\$100,000 to \$250,000	>\$250,000 to \$1,000,000	All	Rev\$ 1 Million or Less
<b>Full Review:</b>									
2014 Toledo OH MSA	22	10.00	69.33	95.45	100.00	0.00	0.00	0.17	0.38
<b>Limited Review:</b>									
2014 Akron OH MSA	13	5.91	69.88	100.00	100.00	0.00	0.00	0.10	0.26
2014 Canton-Massillon	1	0.45	72.00	100.00	100.00	0.00	0.00	0.02	0.05
2014 Central Non-MSA	32	14.55	71.45	96.88	96.88	3.13	0.00	0.14	0.31
2014 Cleveland-Elyria OH	23	10.45	70.43	95.65	100.00	0.00	0.00	0.05	0.10
2014 Columbiana County	5	2.27	72.50	100.00	100.00	0.00	0.00	0.24	0.52
2014 Columbus OH MSA	29	13.18	69.07	86.21	86.21	13.79	0.00	0.05	0.13
2014 Dayton OH MSA	12	5.45	71.34	91.67	100.00	0.00	0.00	0.06	0.11
2014 Erie and Ottawa Counties OH	9	4.09	71.02	88.89	100.00	0.00	0.00	0.46	1.08
2014 Lima OH MSA	4	1.82	68.48	100.00	100.00	0.00	0.00	0.35	1.07
2014 Mansfield OH MSA	4	1.82	70.11	100.00	100.00	0.00	0.00	0.13	0.33
2014 Northwest Non-MSA	26	11.82	70.44	92.31	96.15	3.85	0.00	0.69	1.42
2014 Preble County OH	1	0.45	73.53	100.00	100.00	0.00	0.00	0.20	0.42

\* Based on 2014 Peer Small Business Data – US and PR

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

\*\*\* Businesses with revenues of \$1 million or less as a percentage of all businesses (Source D&B - 2014).

\*\*\*\* Small loans to businesses with revenues of \$1 million or less as a percentage of all loans reported as small loans to businesses. No information was available for 3.64% of small loans to businesses originated and purchased by the bank.

**Table 11. Borrower Distribution of Small Loans to Businesses**

Borrower Distribution: SMALL LOANS TO BUSINESSES		Geography: OHIO			Evaluation Period: JANUARY 1, 2014 TO JUNE 30, 2015				
Assessment Area:	Total Small Loans to Businesses		Businesses With Revenues of \$1 million or less		Loans by Original Amount Regardless of Business Size			Market Share <sup>1</sup>	
	#	% of Total <sup>**</sup>	% of Businesses <sup>***</sup>	% BANK Loans <sup>****</sup>	\$100,000 or less	>\$100,000 to \$250,000	>\$250,000 to \$1,000,000	All	Rev\$ 1 Million or Less
<b>Limited Review:</b>									
2014 Southern Non-MSA	26	11.82	70.81	96.15	100.00	0.00	0.00	0.73	1.60
2014 Springfield OH MSA	1	0.45	72.91	100.00	100.00	0.00	0.00	0.00	0.00
2014 Western Non-MSA	4	1.82	71.02	100.00	100.00	0.00	0.00	0.13	0.34
2014 Wheeling OH MSA	2	0.91	68.50	100.00	100.00	0.00	0.00	0.12	0.36
2014 Youngstown-Warren-Boardman OH MSA	6	2.73	72.08	83.33	83.33	16.67	0.00	0.07	0.14

\* Based on 2014 Peer Small Business Data – US and PR

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

\*\*\* Businesses with revenues of \$1 million or less as a percentage of all businesses (Source D&B - 2014).

\*\*\*\* Small loans to businesses with revenues of \$1 million or less as a percentage of all loans reported as small loans to businesses. No information was available for 3.64% of small loans to businesses originated and purchased by the bank.

**Table 12. Borrower Distribution of Small Loans to Farms**

Borrower Distribution: SMALL LOANS TO FARMS			Geography: OHIO		Evaluation Period: JANUARY 1, 2014 TO JUNE 30, 2015				
Assessment Area:	Total Small Loans to Farms		Farms With Revenues of \$1 million or less		Loans by Original Amount Regardless of Farm Size			Market Share <sup>1</sup>	
	#	% of Total <sup>**</sup>	% of Farms <sup>***</sup>	% BANK Loans <sup>****</sup>	\$100,000 or less	>\$100,000 to \$250,000	>\$250,000 to \$500,000	All	Rev\$ 1 Million or Less
<b>Full Review:</b>									
2014 Toledo OH MSA	0	0.00	96.98	0.00	0.00	0.00	0.00	0.00	0.00
<b>Limited Review:</b>									
2014 Akron OH MSA	0	0.00	97.72	0.00	0.00	0.00	0.00	0.00	0.00
2014 Canton-Massillon OH	0	0.00	98.66	0.00	0.00	0.00	0.00	0.00	0.00
2014 Central Non-MSA OH	0	0.00	98.78	0.00	0.00	0.00	0.00	0.00	0.00
2014 Cleveland-Elyria OH	0	0.00	97.00	0.00	0.00	0.00	0.00	0.00	0.00
2014 Columbiana County	0	0.00	98.96	0.00	0.00	0.00	0.00	0.00	0.00
2014 Columbus OH MSA	0	0.00	97.04	0.00	0.00	0.00	0.00	0.00	0.00
2014 Dayton OH MSA	0	0.00	97.55	0.00	0.00	0.00	0.00	0.00	0.00
2014 Erie and Ottawa Counties OH	0	0.00	98.38	0.00	0.00	0.00	0.00	0.00	0.00
2014 Lima OH MSA	0	0.00	98.83	0.00	0.00	0.00	0.00	0.00	0.00
2014 Mansfield OH MSA	0	0.00	98.67	0.00	0.00	0.00	0.00	0.00	0.00
2014 Northwest Non-MSA	0	0.00	99.29	0.00	0.00	0.00	0.00	0.00	0.00
2014 Preble County OH	0	0.00	99.30	0.00	0.00	0.00	0.00	0.00	0.00

\* Based on 2014 Peer Small Business Data – US and PR

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

\*\*\* Farms with revenues of \$1 million or less as a percentage of all farms (Source D&B - 2014).

\*\*\*\* Small loans to farms with revenues of \$1 million or less as a percentage of all loans reported as small loans to farms. No information was available for 0.00% of small loans to farms originated and purchased by the bank.

**Table 12. Borrower Distribution of Small Loans to Farms**

Borrower Distribution: SMALL LOANS TO FARMS		Geography: OHIO			Evaluation Period: JANUARY 1, 2014 TO JUNE 30, 2015				
Assessment Area:	Total Small Loans to Farms		Farms With Revenues of \$1 million or less		Loans by Original Amount Regardless of Farm Size			Market Share*	
	#	% of Total**	% of Farms***	% BANK Loans****	\$100,000 or less	>\$100,000 to \$250,000	>\$250,000 to \$500,000	All	Rev\$ 1 Million or Less
<b>Limited Review:</b>									
2014 Southern Non-MSA OH	0	0.00	99.40	0.00	0.00	0.00	0.00	0.00	0.00
2014 Springfield OH MSA	0	0.00	98.56	0.00	0.00	0.00	0.00	0.00	0.00
2014 Western Non-MSA OH	0	0.00	99.02	0.00	0.00	0.00	0.00	0.00	0.00
2014 Wheeling OH MSA	0	0.00	98.77	0.00	0.00	0.00	0.00	0.00	0.00
2014 Youngstown-Warren-Boardman OH MSA	0	0.00	98.36	0.00	0.00	0.00	0.00	0.00	0.00

\* Based on 2014 Peer Small Business Data – US and PR

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

\*\*\* Farms with revenues of \$1 million or less as a percentage of all farms (Source D&B - 2014).

\*\*\*\* Small loans to farms with revenues of \$1 million or less as a percentage of all loans reported as small loans to farms. No information was available for 0.00% of small loans to farms originated and purchased by the bank.



**Table 13. Geographic and Borrower Distribution of Consumer Loans**

Geographic and Borrower Distribution: CONSUMER LOANS																		Geography: OHIO				Evaluation Period: JANUARY 1, 2014 TO JUNE 30, 2015			
Assessment Area:	Geographic Distribution										Borrower Distribution														
	Total Consumer Loans		Low-Income Geographies		Moderate-Income Geographies		Middle-Income Geographies		Upper-Income Geographies		Low-Income Borrowers		Moderate-Income Borrowers		Middle-Income Borrowers		Upper-Income Borrowers								
	#	% of Total	% of Hhlds**	% of BANK Loans	% of Hhlds**	% of BANK Loans	% of Hhlds**	% of BANK Loans	% of Hhlds**	% of BANK Loans	% of Hhlds**	% of BANK Loans	% of Hhlds**	% of BANK Loans	% of Hhlds**	% of BANK Loans	% of Hhlds**	% of BANK Loans							
<b>Full Review:</b>																									
2014 Toledo OH MSA	252	9.98	9.60	15.08	17.52	20.63	46.26	53.57	26.57	10.71	25.05	65.48	15.92	19.05	16.78	9.13	42.24	6.35							
<b>Limited Review:</b>																									
2014 Akron OH MSA	142	5.62	8.49	4.93	21.75	30.28	40.40	47.89	29.36	16.90	24.23	69.01	15.80	17.61	18.16	11.97	41.82	1.41							
2014 Canton-Massillon OH MSA	70	2.77	5.16	11.43	12.29	35.71	57.83	50.00	24.72	2.86	22.87	58.57	17.20	28.57	18.55	8.57	41.39	4.29							
2014 Central Non-MSA OH	413	16.35	0.59	2.18	15.24	23.97	70.62	63.20	13.55	10.65	21.88	61.74	16.64	24.46	19.59	7.26	41.90	6.54							
2014 Cleveland-Elyria OH MSA	256	10.13	10.64	27.73	18.49	34.38	39.71	30.86	31.15	7.03	24.93	65.63	15.54	21.48	17.63	8.98	41.90	3.91							
2014 Columbiana County OH	163	6.45	0.00	0.00	22.39	26.99	72.48	68.71	5.13	4.29	25.57	58.28	18.20	22.70	18.44	11.66	37.80	7.36							
2014 Columbus OH	198	7.84	10.48	13.64	20.68	36.36	36.90	43.43	31.93	6.57	23.54	64.14	16.08	15.66	18.01	14.14	42.36	6.06							
2014 Dayton OH MSA	153	6.06	7.03	16.99	23.05	39.22	42.52	33.99	27.41	9.80	23.82	64.71	16.46	18.30	17.77	12.42	41.95	4.58							
2014 Erie and Ottawa Counties OH	59	2.34	0.00	0.00	6.72	11.86	43.95	59.32	49.33	28.81	20.08	62.71	13.64	18.64	18.47	6.78	47.81	11.86							
2014 Lima OH MSA	39	1.54	9.27	25.64	13.90	15.38	49.49	46.15	27.35	12.82	24.63	82.05	16.11	2.56	17.35	7.69	41.90	7.69							
2014 Mansfield OH	27	1.07	0.00	0.00	26.02	44.44	47.90	33.33	26.08	22.22	20.62	77.78	17.99	18.52	19.15	3.70	42.23	0.00							
2014 Northwest Non-MSA OH	175	6.93	0.00	0.00	5.48	19.43	62.84	60.00	31.68	20.57	18.50	62.29	16.04	22.29	19.79	10.86	45.67	4.57							
2014 Preble County	24	0.95	0.00	0.00	5.70	16.67	81.44	66.67	12.86	16.67	18.51	83.33	14.09	8.33	19.55	8.33	47.85	0.00							

\* Consumer Loans originated and purchased in the MA/AA as a percentage of all consumer loans originated and purchased in the rated area.  
 \*\* Percentage of households is based on 2010 Census Information.

**Table 13. Geographic and Borrower Distribution of Consumer Loans**

Geographic and Borrower Distribution: CONSUMER LOANS																		Geography: OHIO				Evaluation Period: JANUARY 1, 2014 TO JUNE 30, 2015			
Assessment Area:	Geographic Distribution										Borrower Distribution														
	Total Consumer Loans		Low-Income Geographies		Moderate-Income Geographies		Middle-Income Geographies		Upper-Income Geographies		Low-Income Borrowers		Moderate-Income Borrowers		Middle-Income Borrowers		Upper-Income Borrowers								
	#	% of Total*	% of Hhlds**	% of BANK Loans	% of Hhlds**	% of BANK Loans	% of Hhlds**	% of BANK Loans	% of Hhlds**	% of BANK Loans	% of Hhlds**	% of BANK Loans	% of Hhlds**	% of BANK Loans	% of Hhlds**	% of BANK Loans	% of Hhlds**	% of BANK Loans							
<b>Limited Review:</b>																									
2014 Southern Non-MSA OH	223	8.83	3.75	4.04	19.93	25.11	69.91	67.71	6.41	3.14	28.29	66.82	16.65	21.08	17.62	7.62	37.44	4.48							
2014 Springfield OH MSA	55	2.18	9.63	14.55	16.07	23.64	42.43	34.55	31.87	27.27	23.51	49.09	16.26	30.91	18.90	7.27	41.33	12.73							
2014 Western Non-MSA OH	134	5.30	0.00	0.00	14.24	20.90	51.80	55.97	33.96	23.13	19.70	61.19	15.20	25.37	18.40	9.70	46.70	3.73							
2014 Wheeling OH MSA	36	1.43	5.15	0.00	14.57	16.67	63.77	50.00	16.51	33.33	23.47	50.00	15.89	19.44	18.49	16.67	42.15	13.89							
2014 Youngstown-Warren-Boardman	107	4.24	7.92	6.54	16.12	28.04	53.38	51.40	22.58	14.02	24.61	55.14	16.17	27.10	18.09	14.02	41.14	3.74							

\* Consumer Loans originated and purchased in the MA/AA as a percentage of all consumer loans originated and purchased in the rated area.  
 \*\* Percentage of households is based on 2010 Census Information.

**Table 14. Qualified Investments**

QUALIFIED INVESTMENTS									
Geography: OHIO									
Evaluation Period: JUNE 24, 2012 TO JULY 13, 2015									
Assessment Area:	Prior Period Investments*		Current Period Investments		Total Investments			Unfunded Commitments**	
	#	\$(000's)	#	\$(000's)	#	\$(000's)	% of Total	#	\$(000's)
<b>Full Review:</b>									
2014 Toledo OH MSA	3	453	6	2,031	9	2,514	31.53	0	0
<b>Limited Review:</b>									
2014 Akron OH MSA	0	0	2	195	2	195	2.45	0	0
2014 Canton-Massillon OH MSA	0	0	4	386	4	386	4.84	0	0
2014 Central Non-MSA OH	0	0	1	129	1	129	1.58	0	0
2014 Cleveland-Elyria OH MSA	0	0	1	186	1	186	2.33	0	0
2014 Columbiana County OH	0	0	15	1,896	15	1,896	23.78	0	0
2014 Columbus OH MSA	0	0	3	394	3	394	4.94	0	0
2014 Dayton OH MSA	1	121	5	619	6	740	9.28	0	0
2014 Erie and Ottawa Counties OH	0	0	3	163	3	163	2.04	0	0
2014 Lima OH MSA	0	0	2	213	2	213	2.67	0	0
2014 Mansfield OH MSA	0	0	1	133	1	133	1.67	0	0
2014 Northwest Non-MSA OH	0	0	3	218	3	218	2.73	0	0
2014 Preble County OH	0	0	1	96	1	96	1.20	0	0
2014 Southern Non-MSA OH	0	0	3	207	3	207	2.60	0	0
2014 Springfield OH MSA	0	0	2	186	2	186	2.33	0	0
2014 Western Non-MSA	0	0	1	63	1	63	0.79	0	0
2014 Wheeling OH MSA	0	0	1	73	1	73	0.92	0	0
2014 Youngstown-Warren-Boardman OH MSA	0	0	2	184	2	184	2.32	0	0

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

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

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

DISTRIBUTION OF BRANCH DELIVERY SYSTEM AND BRANCH OPENINGS/CLOSINGS																Geography: OHIO				Evaluation Period: JANUARY 1, 2014 TO JUNE 30, 2015			
MA/Assessment Area:	Deposits	Branches						Branch Openings/Closings						Population									
	% of Rated Area Deposits in AA	# of BANK Branches	% of Rated Area Branches in AA	Location of Branches by Income of Geographies (%)				# of Branch Openings	# of Branch Closings	Net change in Location of Branches (+ or -)				% of Population within Each Geography									
				Low	Mod	Mid	Upp			Low	Mod	Mid	Upp	Low	Mod	Mid	Upp						
<b>Full Review:</b>																							
2014 Toledo OH MSA	9.61	7	10.15	0.00	14.30	42.85	42.85	0	0	0	0	0	0	9.43	16.63	45.30	27.78						
<b>Limited Review:</b>																							
2014 Akron OH MSA	5.02	4	5.80	0.00	0.00	0.00	100.00	0	0	0	0	0	0	9.27	20.30	39.41	31.03						
2014 Canton-Massillon	3.31	3	4.35	0.00	33.33	66.67	0.00	0	0	0	0	0	0	4.77	12.26	57.20	25.78						
2014 Central Non-MSA	18.61	11	15.95	0.00	0.00	75.76	24.24	0	0	0	0	0	0	0.71	14.33	71.47	13.49						
2014 Cleveland-Elyria OH	9.80	6	8.70	16.67	33.33	33.33	16.67	0	0	0	0	0	0	10.38	17.42	38.71	33.49						
2014 Columbiana County	4.26	2	2.90	0.00	0.00	100.00	0.00	0	0	0	0	0	0	0.00	21.77	73.08	5.16						
2014 Columbus OH MSA	7.46	6	8.70	0.00	0.00	83.33	16.67	0	0	0	0	0	0	10.22	19.85	35.77	33.56						
2014 Dayton OH MSA	6.02	6	8.70	0.00	50.00	16.67	33.33	0	0	0	0	0	0	7.08	22.23	42.05	28.64						
2014 Erie and Ottawa Counties OH	6.46	2	2.90	0.00	0.00	50.00	50.00	0	0	0	0	0	0	0.00	6.32	42.52	51.16						
2014 Lima OH MSA	1.46	1	1.45	0.00	0.00	100.00	0.00	0	0	0	0	0	0	9.04	15.51	48.05	27.40						
2014 Mansfield OH MSA	0.93	1	1.45	0.00	0.00	0.00	100.00	0	0	0	0	0	0	0.00	27.88	45.91	26.21						
2014 Northwest Non-MSA	4.07	5	7.25	0.00	0.00	60.00	40.00	0	0	0	0	0	0	0.00	5.12	62.11	32.77						
2014 Preble County	0.95	1	1.45	0.00	0.00	0.00	100.00	0	0	0	0	0	0	0.00	5.74	80.82	13.44						
2014 Southern Non-MSA	8.34	5	7.25	0.00	20.00	80.00	0.00	0	0	0	0	0	0	3.23	21.22	69.49	6.05						
2014 Springfield OH	1.38	1	1.45	0.00	0.00	100.00	0.00	0	0	0	0	0	0	10.36	16.17	41.08	32.38						
2014 Western Non-MSA	6.18	5	7.25	0.00	60.00	40.00	0.00	0	0	0	0	0	0	0.00	13.60	51.24	35.16						
2014 Wheeling OH	2.96	1	1.45	0.00	0.00	0.00	100.00	0	0	0	0	0	0	3.81	13.41	61.51	21.27						
2014 Youngstown-Warren-Boardman OH	3.19	2	2.90	0.00	0.00	0.00	100.00	0	0	0	0	0	0	8.19	15.72	52.82	23.27						

Table 1. Lending Volume

LENDING VOLUME		Geography: PENNSYLVANIA						Evaluation Period: JANUARY 1, 2014 TO JUNE 30, 2015				
Assessment Area (2014):	% of Rated Area Loans (#) in MA/AA*	Home Mortgage		Small Loans to Businesses		Small Loans to Farms		Community Development Loans**		Total Reported Loans		% of Rated Area Deposits in MA/AA***
		#	\$ (000's)	#	\$ (000's)	#	\$(000's)	#	\$ (000's)	#	\$(000's)	
<b>Full Review:</b>												
2014 Montgomery Co-Bucks Co-Chester Co PA MD	7.15	25	3,111	6	145	0	0	1	40	32	3,296	4.67
<b>Limited Review:</b>												
2014 Allentown-Bethlehem-Easton PA MSA	6.03	23	3,149	3	143	0	0	1	20	27	3,312	2.33
2014 Altoona PA MSA	3.13	13	1,333	0	0	0	0	1	5	14	1,338	2.07
2014 Chambersburg-Waynesboro MSA	6.03	25	3,120	2	2	0	0	0	0	27	3,122	2.09
2014 East Stroudsburg PA MSA	5.58	20	2,424	4	9	0	0	1	10	25	2,443	6.48
2014 Erie PA MSA	8.04	26	2,990	9	32	0	0	1	10	36	3,032	3.94
2014 Greene County PA	1.12	4	355	0	0	0	0	1	5	5	360	3.06
2014 Harrisburg-Carlisle PA MSA	6.47	26	3,115	2	2	0	0	1	10	29	3,127	5.03
2014 Johnstown PA MSA	1.56	6	537	0	0	0	0	1	5	7	542	2.82
2014 Lancaster PA MSA	6.03	23	2,449	4	197	0	0	0	0	27	2,646	1.27
2014 Lebanon PA MSA	5.13	23	2,797	0	0	0	0	0	0	23	2,797	1.18
2014 Newark PA MD	1.56	3	355	3	185	0	0	1	5	7	545	3.72
2014 Northumberland-Schuylkill-Union Counties PA	5.13	22	2,280	0	0	0	0	1	10	23	2,290	8.19
2014 Pittsburgh PA MSA	10.71	34	3,038	11	98	0	0	3	85	48	3,221	24.41
2014 Reading PA MSA	6.47	25	2,691	3	66	0	0	1	10	29	2,767	9.79
2014 Scranton-Wilkes-Barre-Hazleton PA MSA	6.25	26	2,273	1	2	0	0	1	10	28	2,285	4.22
2014 State College PA MSA	4.91	22	3,647	0	0	0	0	0	0	22	3,647	0.69
2014 Venango and Warren Counties PA	0.89	0	0	3	5	0	0	1	10	4	15	4.85
2014 Wayne County PA	1.56	6	821	0	0	0	0	1	5	7	826	2.65
2014 York-Hanover PA MSA	6.25	26	3,408	1	1	0	0	1	10	28	3,419	6.60

\* Loan Data as of June 30, 2015. Rated area refers to either state or multistate MA rating area.

\*\* The evaluation period for Community Development Loans is from January 01, 2014 to July 13, 2015.

\*\*\* Deposit Data as of June 30, 2014. Rated Area refers to either the state, multistate MA, or institution, as appropriate.

**Table 1. Other Products**

LENDING VOLUME		Geography: PENNSYLVANIA				Evaluation Period: JANUARY 1, 2014 TO JUNE 30, 2015								
Assessment Area (2014):	% of Rated Area Loans (#)MA/AA*	Total Optional Loans**		Small Business Real Estate Secured**		Home Equity**		Motor Vehicle**		Credit Card**		Other Secured Consumer**		% of Rated Area Deposits in AA***
		#	\$ (000's)	#	\$ (000's)	#	\$ (000's)	#	\$ (000's)	#	\$ (000's)	#	\$ (000's)	
<b>Full Review:</b>														
2014 Montgomery Co-Bucks Co-Chester Co	7.33	90	114	0	0	0	0	0	0	0	0	0	0	4.67
<b>Limited Review:</b>														
2014 Allentown-Bethlehem-Easton PA	2.36	29	38	0	0	0	0	0	0	0	0	0	0	2.33
2014 Altoona PA MSA	2.61	32	45	0	0	0	0	0	0	0	0	0	0	2.07
2014 Chambersburg-Waynesboro PA MSA	3.83	47	62	0	0	0	0	0	0	0	0	0	0	2.09
2014 East Stroudsburg PA MSA	2.93	36	60	0	0	0	0	0	0	0	0	0	0	6.48
2014 Erie PA MSA	5.79	71	100	0	0	0	0	0	0	0	0	0	0	3.94
2014 Greene County PA	1.79	22	33	0	0	0	0	0	0	0	0	0	0	3.06
2014 Harrisburg-Carlisle PA MSA	4.24	52	72	0	0	0	0	0	0	0	0	0	0	5.03
2014 Johnstown PA MSA	3.34	41	57	0	0	0	0	0	0	0	0	0	0	2.82
2014 Lancaster PA MSA	4.73	58	68	0	0	0	0	0	0	0	0	0	0	1.27
2014 Lebanon PA MSA	1.71	21	23	0	0	0	0	0	0	0	0	0	0	1.18
2014 Newark PA MD	1.22	15	23	0	0	0	0	0	0	0	0	0	0	3.72
2014 Northumberland-Schuylkill-Union Counties PA	9.05	111	155	0	0	0	0	0	0	0	0	0	0	8.19
2014 Pittsburgh PA MSA	25.51	313	414	0	0	0	0	0	0	0	0	0	0	24.41
2014 Reading PA MSA	9.37	115	149	0	0	0	0	0	0	0	0	0	0	9.79
2014 Scranton-Wilkes-Barre-Hazleton PA MSA	3.67	45	62	0	0	0	0	0	0	0	0	0	0	4.22
2014 State College PA MSA	0.57	7	10	0	0	0	0	0	0	0	0	0	0	0.69
2014 Venango and Warren Counties PA	3.83	47	63	0	0	0	0	0	0	0	0	0	0	4.85
2014 Wayne County PA	1.47	18	27	0	0	0	0	0	0	0	0	0	0	2.65
2014 York-Hanover PA MSA	4.65	57	67	0	0	0	0	0	0	0	0	0	0	6.60

\* Loan Data as of June 30, 2015. Rated area refers to either state or multistate MA rating area.  
 \*\* The evaluation period for Optional Product Line(s) is from January 01, 2014 to June 30, 2015.  
 \*\*\* Deposit Data as of June 30, 2014. Rated Area refers to either the state, multistate MA, or institution, as appropriate.

Table 1. Other Products

LENDING VOLUME		Geography: PENNSYLVANIA		Evaluation Period: JANUARY 1, 2014 TO JUNE 30, 2015	
Assessment Area (2014):	Other Unsecured Consumer Loans*		Other Optional Loans*		
	#	\$ (000's)	#	\$ (000's)	
<b>Full Review:</b>					
2014 Montgomery Co-Bucks Co-Chester Co PA MD	90	114	0	0	
<b>Limited Review:</b>					
2014 Allentown-Bethlehem-Easton PA MSA	29	38	0	0	
2014 Altoona PA MSA	32	45	0	0	
2014 Chambersburg-Waynesboro PA MSA	47	62	0	0	
2014 East Stroudsburg PA MSA	36	60	0	0	
2014 Erie PA MSA	71	100	0	0	
2014 Greene County PA	22	33	0	0	
2014 Harrisburg-Carlisle PA MSA	52	72	0	0	
2014 Johnstown PA MSA	41	57	0	0	
2014 Lancaster PA MSA	58	68	0	0	
2014 Lebanon PA MSA	21	23	0	0	
2014 Newark PA MD	15	23	0	0	
2014 Northumberland-Schuylkill-Union Counties PA	111	155	0	0	
2014 Pittsburgh PA MSA	313	414	0	0	
2014 Reading PA MSA	115	149	0	0	
2014 Scranton-Wilkes-Barre-Hazleton PA MSA	45	62	0	0	
2014 State College PA MSA	7	10	0	0	
2014 Venango and Warren Counties PA	47	63	0	0	
2014 Wayne County PA	18	27	0	0	
2014 York-Hanover PA MSA	57	67	0	0	

\* The evaluation period for Optional Product Line(s) is from January 01, 2014 to June 30, 2015.

**Table 4. Geographic Distribution of Home Mortgage Refinance Loans**

Geographic Distribution: HOME MORTGAGE REFINANCE			Geography: PENNSYLVANIA				Evaluation Period: JANUARY 1, 2014 TO JUNE 30, 2015					Market Share (%) by Geography*				
Assessment Area:	Total Home Mortgage Refinance Loans		Low-Income Geographies		Moderate-Income Geographies		Middle-Income Geographies		Upper-Income Geographies							
	#	% of Total**	% Owner Occ Units***	% BANK Loans****	% Owner Occ Units***	% BANK Loans	% Owner Occ Units***	% BANK Loans	% Owner Occ Units***	% BANK Loans	Overall	Low	Mod	Mid	Upp	
<b>Full Review:</b>																
2014 Montgomery Co-Bucks Co-Chester Co PA	25	6.87	0.86	4.00	17.36	28.00	50.27	56.00	31.52	12.00	0.13	0.58	0.23	0.15	0.05	
<b>Limited Review:</b>																
2014 Allentown-Bethlehem-Easton PA	22	6.04	5.02	9.09	22.21	31.82	45.43	45.45	27.35	13.64	0.57	1.25	1.11	0.52	0.20	
2014 Altoona PA MSA	12	3.30	0.35	0.00	8.96	0.00	79.40	91.67	11.29	8.33	0.81	0.00	0.00	1.03	0.00	
2014 Chambersburg-Waynesboro PA MSA	25	6.87	0.00	0.00	6.49	20.00	84.63	72.00	8.88	8.00	0.81	0.00	4.40	0.58	0.00	
2014 East Stroudsburg PA	19	5.22	0.00	0.00	3.84	0.00	79.53	94.74	16.63	5.26	0.67	0.00	0.00	0.87	0.00	
2014 Erie PA MSA	25	6.87	3.95	0.00	13.43	24.00	47.72	24.00	34.90	52.00	0.63	0.00	1.35	0.34	0.79	
2014 Greene County PA	3	0.82	0.00	0.00	0.00	0.00	100.00	100.00	0.00	0.00	1.60	0.00	0.00	1.60	0.00	
2014 Harrisburg-Carlisle PA	25	6.87	0.00	0.00	9.12	8.00	53.61	60.00	37.27	32.00	0.65	0.00	0.50	0.85	0.45	
2014 Johnstown PA MSA	5	1.37	0.00	0.00	13.18	20.00	66.53	60.00	20.29	20.00	0.58	0.00	1.49	0.50	0.49	
2014 Lancaster PA MSA	22	6.04	1.85	9.09	6.49	22.73	77.96	59.09	13.70	9.09	0.58	3.23	1.95	0.44	0.37	
2014 Lebanon PA MSA	23	6.32	0.00	0.00	7.60	0.00	66.12	78.26	26.28	21.74	0.75	0.00	0.00	1.14	0.00	
2014 Newark PA MD	3	0.82	0.00	0.00	80.12	33.33	19.88	66.67	0.00	0.00	0.46	0.00	0.18	1.98	0.00	
2014 Northumberland-Schuylkill-Union Counties	22	6.04	0.00	0.00	12.03	0.00	63.52	72.73	24.45	27.27	1.61	0.00	0.00	1.85	1.40	
2014 Pittsburgh PA MSA	32	8.79	2.13	3.13	19.20	40.63	50.85	31.25	27.82	25.00	0.17	0.00	0.50	0.11	0.12	
2014 Reading PA MSA	25	6.87	7.11	4.00	5.12	4.00	60.26	60.00	27.51	32.00	0.69	0.00	0.00	0.75	0.71	
2014 Scranton-Wilkes-Barre-Hazleton PA MSA	25	6.87	0.71	4.00	15.25	24.00	59.47	60.00	24.57	12.00	0.63	3.57	1.01	0.67	0.30	

\* Based on 2014 Peer Mortgage Data – US and PR

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

\*\*\* Percentage of Owner Occupied Units is the number of owner occupied units in a particular geography divided by the number of owner occupied housing units in the area based on 2010 Census information.

\*\*\*\* Data shown includes only One to Four-family and manufactured housing. (Property type of 1 or 2)



Charter Number: 16892

2014 State College PA MSA	20	5.49	0.05	0.00	12.86	5.00	59.40	60.00	27.69	35.00	0.31	0.00	0.00	0.34	0.36
2014 Venango and Warren Counties PA	0	0.00	0.00	0.00	4.99	0.00	86.41	0.00	8.60	0.00	0.00	0.00	0.00	0.00	0.00
2014 Wayne County PA	6	1.65	0.00	0.00	0.00	0.00	87.43	100.00	12.57	0.00	0.84	0.00	0.00	0.98	0.00
2014 York-Hanover PA MSA	25	6.87	2.71	4.00	6.40	0.00	69.57	76.00	21.33	20.00	0.54	0.00	0.00	0.68	0.32

**Table 10. Borrower Distribution of Home Mortgage Refinance Loans**

Borrower Distribution: HOME MORTGAGE REFINANCE			Geography: PENNSYLVANIA				Evaluation Period: JANUARY 1, 2014 TO JUNE 30, 2015					Market Share*				
Assessment Area:	Total Home Mortgage Refinance Loans		Low-Income Borrowers		Moderate-Income Borrowers		Middle-Income Borrowers		Upper-Income Borrowers							
	#	% of Total**	% Families***	% BANK Loans****	% Families <sup>41</sup>	% BANK Loans****	% Families***	% BANK Loans****	% Families***	% BANK Loans****	Overall	Low	Mod	Mid	Upp	
<b>Full Review:</b>																
2014 Montgomery Co-Bucks Co-Chester Co PA	25	6.87	18.70	44.00	18.39	20.00	22.99	24.00	39.92	12.00	0.16	0.75	0.15	0.14	0.04	
<b>Limited Review:</b>																
2014 Allentown-Bethlehem-Easton PA	22	6.04	22.74	22.73	19.45	36.36	21.68	9.09	36.13	31.82	0.69	0.68	1.45	0.30	0.57	
2014 Altoona PA MSA	12	3.30	19.37	0.00	18.28	25.00	23.04	25.00	39.32	50.00	0.89	0.00	1.74	1.04	0.55	
2014 Chambersburg-Waynesboro PA MSA	25	6.87	16.42	12.50	20.10	33.33	24.62	12.50	38.86	41.67	0.91	2.86	1.57	0.00	0.87	
2014 East Stroudsburg	19	5.22	20.07	5.26	17.27	26.32	22.89	26.32	39.77	42.11	0.82	0.00	1.72	1.00	0.56	
2014 Erie PA MSA	25	6.87	20.77	8.00	17.99	20.00	21.23	28.00	40.02	44.00	0.70	0.90	1.05	0.88	0.47	
2014 Greene County PA	3	0.82	22.66	0.00	18.42	0.00	18.36	0.00	40.56	100.00	1.71	0.00	0.00	0.00	2.88	
2014 Harrisburg-Carlisle	25	6.87	14.67	12.00	17.94	56.00	23.70	20.00	43.69	12.00	0.79	1.78	2.12	0.41	0.13	
2014 Johnstown PA	5	1.37	18.90	40.00	19.61	0.00	22.01	0.00	39.47	60.00	0.66	3.28	0.00	0.00	0.81	
2014 Lancaster PA MSA	22	6.04	17.38	13.64	19.06	31.82	24.77	27.27	38.79	27.27	0.70	1.63	0.94	0.81	0.36	
2014 Lebanon PA MSA	23	6.32	17.00	13.04	18.58	39.13	24.94	21.74	39.48	26.09	0.90	2.86	1.65	0.36	0.26	
2014 Newark PA MD	3	0.82	32.50	0.00	25.89	33.33	23.74	33.33	17.88	33.33	0.58	0.00	0.62	0.78	0.81	

\* Based on 2014 Peer Mortgage Data – US and PR

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

\*\*\* Percentage of Families is based on the 2010 Census information.

\*\*\*\* As a percentage of loans with borrower income information available. No information was available for 0.3% of loans originated and purchased by bank.

41 Data shown includes only One to Four-family and manufactured housing. (Property type of 1 or 2)

2014 Northumberland-Schuylkill-Union Counties	22	6.04	17.16	4.55	19.27	22.73	22.76	36.36	40.82	36.36	1.87	1.30	2.90	2.07	1.46
2014 Pittsburgh PA MSA	32	8.79	20.37	21.88	18.11	28.13	21.89	31.25	39.62	18.75	0.18	0.62	0.26	0.24	0.06
2014 Reading PA MSA	25	6.87	20.50	16.00	17.37	32.00	23.18	20.00	38.95	32.00	0.84	1.43	1.21	0.58	0.73
2014 Scranton-Wilkes-Barre-Hazleton PA MSA	25	6.87	20.44	24.00	18.03	24.00	21.57	32.00	39.96	20.00	0.74	2.16	1.00	0.97	0.29
2014 State College PA	20	5.49	18.29	0.00	19.03	20.00	22.77	50.00	39.91	30.00	0.35	0.00	0.53	0.43	0.30
2014 Venango and Warren Counties PA	0	0.00	16.90	0.00	20.61	0.00	23.03	0.00	39.46	0.00	0.00	0.00	0.00	0.00	0.00
2014 Wayne County PA	6	1.65	16.01	0.00	17.28	16.67	24.22	16.67	42.48	66.67	0.97	0.00	1.89	2.41	0.41
2014 York-Hanover PA	25	6.87	17.58	12.00	18.89	32.00	24.52	36.00	39.01	20.00	0.69	1.02	1.04	0.83	0.32

**Table 13. Geographic and Borrower Distribution of Consumer Loans**

Geographic and Borrower Distribution: CONSUMER LOANS																		Geography: PENNSYLVANIA																		Evaluation Period: JANUARY 1, 2014 TO JUNE 30, 2015																	
Assessment Area:	Geographic Distribution										Borrower Distribution																																										
	Total Consumer Loans		Low-Income Geographies		Moderate-Income Geographies		Middle-Income Geographies		Upper-Income Geographies		Low-Income Borrowers		Moderate-Income Borrowers		Middle-Income Borrowers		Upper-Income Borrowers																																				
	#	% of Total*	% of Hhlds**	% of BANK Loans	% of Hhlds**	% of BANK Loans	% of Hhlds**	% of BANK Loans	% of Hhlds**	% of BANK Loans	% of Hhlds**	% of BANK Loans	% of Hhlds**	% of BANK Loans	% of Hhlds**	% of BANK Loans	% of Hhlds**	% of BANK Loans																																			
<b>Full Review:</b>																																																					
2014 Montgomery-Bucks-Chester Counties	90	7.33	2.38	22.22	21.19	30.00	48.51	45.56	27.92	2.22	22.73	87.78	16.78	11.11	19.10	0.00	41.38	1.11																																			
<b>Limited Review:</b>																																																					
2014 Allentown-Bethlehem-Easton PA	29	2.36	9.90	6.90	26.44	34.48	41.43	51.72	22.23	6.90	25.81	58.62	17.88	20.69	18.83	10.34	37.47	10.34																																			
2014 Altoona PA MSA	32	2.61	2.05	3.13	11.46	3.13	76.18	93.75	10.30	0.00	24.42	56.25	17.03	21.88	17.01	3.13	41.54	18.75																																			
2014 Chambersburg-Waynesboro PA MSA	47	3.83	0.00	0.00	10.45	8.51	81.91	89.36	7.64	2.13	21.13	48.94	17.27	34.04	21.37	12.77	40.24	4.26																																			
2014 East Stroudsburg PA MSA	36	2.93	0.00	0.00	3.67	8.33	80.69	72.22	15.64	19.44	22.76	38.89	16.55	25.00	19.60	25.00	41.09	11.11																																			
2014 Erie PA MSA	71	5.79	8.66	14.08	16.79	15.49	43.12	39.44	31.41	30.99	24.28	60.56	16.13	21.13	17.45	12.68	42.14	5.63																																			
2014 Greene County	22	1.79	0.00	0.00	0.00	0.00	100.00	100.00	0.00	0.00	24.68	40.91	16.30	40.91	16.80	9.09	42.23	9.09																																			
2014 Harrisburg-Carlisle PA MSA	52	4.24	0.00	0.00	15.47	36.54	52.66	50.00	31.87	13.46	19.47	65.38	17.14	17.31	18.37	11.54	45.03	5.77																																			
2014 Johnstown PA	41	3.34	0.00	0.00	18.08	4.88	63.74	80.49	18.18	14.63	23.34	63.41	17.23	19.51	17.54	9.76	41.89	7.32																																			
2014 Lancaster PA	58	4.73	4.46	25.86	8.58	36.21	74.99	36.21	11.98	1.72	21.61	67.24	17.20	24.14	20.95	3.45	40.23	5.17																																			

\* Consumer Loans originated and purchased in the MA/AA as a percentage of all consumer loans originated and purchased in the rated area.  
 \*\* Percentage of households is based on 2010 Census Information.

2014 Lebanon PA MSA	21	1.71	0.00	0.00	11.94	28.57	65.00	66.67	23.06	4.76	21.83	85.71	17.01	14.29	21.10	0.00	40.06	0.00
2014 Newark PA MD	15	1.22	0.00	0.00	79.67	86.67	20.33	13.33	0.00	0.00	29.95	66.67	21.87	26.67	23.56	0.00	24.62	6.67
2014 Northumberland-Schuylkill-Union Counties PA	111	9.05	0.00	0.00	15.00	20.72	62.45	63.06	22.52	16.22	23.10	52.25	16.49	20.72	18.41	15.32	42.00	11.71
2014 Pittsburgh PA	313	25.51	4.01	4.47	22.53	44.73	48.88	46.01	24.56	4.79	24.94	61.98	15.89	21.41	17.20	8.31	41.97	8.31
2014 Reading PA MSA	115	9.37	14.10	37.39	6.38	7.83	55.67	47.83	23.85	6.96	23.12	64.35	17.31	26.96	18.69	6.96	40.87	1.74
2014 Scranton-Wilkes-Barre-Hazleton PA	45	3.67	2.19	4.44	19.40	51.11	57.27	35.56	21.13	8.89	24.64	53.33	16.55	20.00	16.87	17.78	41.95	8.89
2014 State College PA	7	0.57	2.93	0.00	16.02	42.86	54.59	57.14	26.17	0.00	25.42	85.71	15.12	14.29	17.46	0.00	42.00	0.00
2014 Venango and Warren Counties PA	47	3.83	0.00	0.00	6.75	2.13	84.71	87.23	8.54	10.64	21.58	51.06	18.03	27.66	18.98	10.64	41.41	10.64
2014 Wayne County	18	1.47	0.00	0.00	0.00	0.00	86.69	77.78	13.31	22.22	19.81	44.44	15.05	22.22	18.49	5.56	46.64	27.78
2014 York-Hanover PA	57	4.65	6.22	24.56	8.47	12.28	66.88	56.14	18.43	7.02	22.20	64.91	16.99	24.56	20.61	7.02	40.20	3.51

**Table 14. Qualified Investments**

QUALIFIED INVESTMENTS									
Geography: PENNSYLVANIA									
Evaluation Period: JUNE 24, 2012 TO JULY 13, 2015									
Assessment Area:	Prior Period Investments*		Current Period Investments		Total Investments			Unfunded Commitments**	
	#	\$(000's)	#	\$(000's)	#	\$(000's)	% of Total	#	\$(000's)
<b>Full Review:</b>									
2014 Montgomery Co-Bucks Co-Chester Co PA MD	1	250	13	1,685	14	1,935	26.95	0	0
<b>Limited Review:</b>									
2014 Allentown-Bethlehem-Easton PA MSA	0	0	4	505	4	505	7.03	0	0
2014 Altoona PA MSA	0	0	2	161	2	161	2.24	0	0
2014 Chambersburg-Waynesboro PA MSA	0	0	1	162	1	162	2.26	0	0
2014 East Stroudsburg PA MSA	0	0	1	95	1	95	1.32	0	0
2014 Erie PA MSA	0	0	3	337	3	337	4.69	0	0
2014 Greene County PA	0	0	0	0	0	0	0.00	0	0
2014 Harrisburg-Carlisle PA MSA	0	0	2	232	2	232	3.23	0	0
2014 Johnstown PA MSA	0	0	2	293	2	293	4.08	0	0
2014 Lancaster PA MSA	0	0	4	424	4	424	5.90	0	0
2014 Lebanon PA MSA	0	0	1	167	1	167	2.33	0	0
2014 Newark PA MD	0	0	1	134	1	134	1.87	0	0
2014 Northumberland-Schuylkill-Union Counties PA	0	0	3	170	3	170	2.37	0	0
2014 Pittsburgh PA MSA	0	0	16	1,113	16	1,113	15.50	0	0
2014 Reading PA MSA	0	0	6	824	6	824	11.47	0	0
2014 Scranton-Wilkes-Barre-Hazleton PA MSA	0	0	1	41	1	41	0.57	0	0
2014 State College PA MSA	0	0	1	129	1	129	1.80	0	0
2014 Venango and Warren Counties PA	0	0	1	42	1	42	0.58	0	0
2014 Wayne County PA	0	0	1	155	1	155	2.16	0	0
2014 York-Hanover PA MSA	1	150	1	112	2	262	3.65	0	0

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

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

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

DISTRIBUTION OF BRANCH DELIVERY SYSTEM AND BRANCH OPENINGS/CLOSINGS    Geography: PENNSYLVANIA    Evaluation Period: JANUARY 1, 2014 TO JUNE 30, 2015																	
MA/Assessment Area:	Deposits	Branches						Branch Openings/Closings						Population			
	% of Rated Area Deposits in AA	# of BANK Branches	% of Rated Area Branches in AA	Location of Branches by Income of Geographies (%)				# of Branch Openings	# of Branch Closings	Net change in Location of Branches (+ or -)				% of Population within Each Geography			
				Low	Mod	Mid	Upp			Low	Mod	Mid	Upp	Low	Mod	Mid	Upp
<b>Full Review:</b>																	
2014 Montgomery Co-Bucks Co-Chester Co PA	4.67	4	9.52	25.00	25.00	50.00	0.00	0	1	0	0	0	-1	2.41	19.73	48.03	29.47
<b>Limited Review:</b>																	
2014 Allentown-Bethlehem-Easton PA MSA	2.33	2	4.76	0.00	0.00	50.00	50.00	0	2	0	0	-1	-1	11.17	25.53	39.68	23.63
2014 Altoona PA MSA	2.07	1	2.38	0.00	0.00	100.00	0.00	0	0	0	0	0	0	1.26	12.28	76.00	10.46
2014 Chambersburg-Waynesboro PA MSA	2.09	1	2.38	0.00	0.00	100.00	0.00	0	0	0	0	0	0	0.00	10.47	81.93	7.60
2014 East Stroudsburg PA	6.48	2	4.76	0.00	0.00	50.00	50.00	0	0	0	0	0	0	0.00	4.41	79.26	16.33
2014 Erie PA MSA	3.94	2	4.76	0.00	0.00	0.00	100.00	0	0	0	0	0	0	8.42	16.82	42.19	31.78
2014 Greene County PA	3.06	1	2.38	0.00	0.00	100.00	0.00	0	0	0	0	0	0	0.00	0.00	100.00	0.00
2014 Harrisburg-Carlisle PA	5.03	3	7.14	0.00	33.33	33.37	33.33	0	0	0	0	0	0	0.00	15.14	50.34	33.06
2014 Johnstown PA MSA	2.82	1	2.38	0.00	0.00	100.00	0.00	0	0	0	0	0	0	0.00	15.74	64.66	19.60
2014 Lancaster PA MSA	1.27	1	2.38	0.00	0.00	100.00	0.00	0	0	0	0	0	0	4.71	8.28	75.44	11.58
2014 Lebanon PA MSA	1.18	1	2.38	0.00	0.00	100.00	0.00	0	0	0	0	0	0	0.00	11.55	65.51	22.94
2014 Newark PA MD	3.72	1	2.38	0.00	100.00	0.00	0.00	0	0	0	0	0	0	0.00	80.65	19.35	0.00

2014 Northumberland-Schuylkill-Union Counties	8.19	2	4.76	0.00	0.00	100.00	0.00	0	0	0	0	0	0	0.00	13.17	61.49	22.41
2014 Pittsburgh PA MSA	24.41	8	19.04	0.00	0.00	50.00	50.00	0	0	0	0	0	0	4.06	21.40	47.75	26.39
2014 Reading PA MSA	9.79	2	4.76	0.00	0.00	100.00	0.00	0	1	0	0	-1	0	14.95	6.51	53.63	24.92
2014 Scranton-Wilkes-Barre-Hazleton PA MSA	4.22	3	7.14	0.00	0.00	100.00	0.00	0	0	0	0	0	0	2.28	19.33	56.18	22.21
2014 State College PA MSA	0.69	1	2.38	0.00	0.00	100.00	0.00	0	0	0	0	0	0	2.87	13.81	49.37	24.15
2014 Venango and Warren Counties	4.80	2	4.76	0.00	0.00	100.00	0.00	0	0	0	0	0	0	0.00	6.70	84.94	8.36
2014 Wayne County PA	2.65	1	2.38	0.00	0.00	100.00	0.00	0	0	0	0	0	0	0.00	0.00	86.73	13.27
2014 York-Hanover PA	6.60	3	7.14	0.00	0.00	100.00	0.00	0	0	0	0	0	0	6.68	7.48	66.08	19.76



**Table 1. Lending Volume**

LENDING VOLUME		Geography: SOUTH CAROLINA				Evaluation Period: JANUARY 1, 2014 TO JUNE 30, 2015						
Assessment Area (2014):	% of Rated Area Loans (#) in MA/AA*	Home Mortgage		Small Loans to Businesses		Small Loans to Farms		Community Development Loans**		Total Reported Loans		% of Rated Area Deposits in MA/AA***
		#	\$ (000's)	#	\$ (000's)	#	\$ (000's)	#	\$ (000's)	#	\$(000's)	
<b>Full Review:</b>												
2014 Columbia SC MSA	23.32	40	3,963	24	49	0	0	2	70	66	4,082	21.18
<b>Limited Review:</b>												
2014 Augusta-Richmond County SC MSA	9.19	22	2,495	3	5	0	0	1	25	26	2,525	7.09
2014 Charleston-North Charleston SC MSA	13.78	31	4,626	6	541	0	0	2	30	39	5,197	7.28
2014 Cherokee County SC	1.77	3	217	1	3	0	0	1	25	5	245	3.38
2014 Colleton County SC	1.41	2	277	1	1	0	0	1	25	4	303	2.98
2014 Greenville-Anderson-Mauldin SC MSA	23.32	39	3,333	25	49	0	0	2	95	66	3,477	34.18
2014 Greenwood County SC	1.41	3	268	0	0	0	0	1	25	4	293	2.67
2014 Hilton Head Island-Bluffton-Beaufort SC MSA	8.84	23	3,779	1	1	0	0	1	25	25	3,805	3.80
2014 Northern Non-MSA SC	6.01	11	1,443	5	6	0	0	1	25	17	1,474	7.56
2014 Oconee County SC	2.47	4	455	2	3	0	0	1	25	7	483	5.11
2014 Spartanburg SC MSA	8.48	20	1,551	0	0	0	0	4	126	24	1,677	4.75

\* Loan Data as of June 30, 2015. Rated area refers to either state or multistate MA rating area.

\*\* The evaluation period for Community Development Loans is from January 01, 2014 to July 13, 2015.

\*\*\* Deposit Data as of June 30, 2014. Rated Area refers to either the state, multistate MA, or institution, as appropriate.

**Table 1. Other Products**

LENDING VOLUME		Geography: SOUTH CAROLINA						Evaluation Period: JANUARY 1, 2014 TO JUNE 30, 2015						
Assessment Area (2014):	% of Rated Area Loans (#) in MA/AA*	Total Optional Loans**		Small Business Real Estate Secured**		Home Equity**		Motor Vehicle**		Credit Card**		Other Secured Consumer**		% of Rated Area Deposits in AA***
		#	\$ (000's)	#	\$ (000's)	#	\$ (000's)	#	\$ (000's)	#	\$ (000's)	#	\$ (000's)	
<b>Full Review:</b>														
2014 Columbia SC MSA	22.89	198	243	0	0	0	0	0	0	0	0	0	0	21.18
<b>Limited Review:</b>														
2014 Augusta-Richmond County SC MSA	5.09	44	60	0	0	0	0	0	0	0	0	0	0	7.09
2014 Charleston-North Charleston SC MSA	5.43	47	58	0	0	0	0	0	0	0	0	0	0	7.28
2014 Cherokee County SC	3.58	31	39	0	0	0	0	0	0	0	0	0	0	3.38
2014 Colleton County SC	3.93	34	40	0	0	0	0	0	0	0	0	0	0	2.98
2014 Greenville-Anderson-Mauldin SC MSA	32.83	284	359	0	0	0	0	0	0	0	0	0	0	34.18
2014 Greenwood County SC	2.54	22	25	0	0	0	0	0	0	0	0	0	0	2.67
2014 Hilton Head Island-Bluffton-Beaufort SC MSA	2.54	22	29	0	0	0	0	0	0	0	0	0	0	3.80
2014 Northern Non-MSA SC	10.64	92	119	0	0	0	0	0	0	0	0	0	0	7.56
2014 Oconee County SC	6.01	52	62	0	0	0	0	0	0	0	0	0	0	5.11
2014 Spartanburg SC MSA	4.51	39	48	0	0	0	0	0	0	0	0	0	0	4.75

\* Loan Data as of June 30, 2015. Rated area refers to either state or multistate MA rating area.

\*\* The evaluation period for Optional Product Line(s) is from January 01, 2014 to June 30, 2014.

\*\*\* Deposit Data as of June 30, 2014. Rated Area refers to either the state, multistate MA, or institution, as appropriate.

Table 1. Other Products

LENDING VOLUME		Geography: SOUTH CAROLINA		Evaluation Period: JANUARY 1, 2014 TO JUNE 30, 2015	
Assessment Area (2014):	Other Unsecured Consumer Loans*		Other Optional Loans*		
	#	\$ (000's)	#	\$ (000's)	
<b>Full Review:</b>					
2014 Columbia SC MSA	198	243	0	0	
<b>Limited Review:</b>					
2014 Augusta-Richmond County SC MSA	44	60	0	0	
2014 Charleston-North Charleston SC MSA	47	58	0	0	
2014 Cherokee County SC	31	39	0	0	
2014 Colleton County SC	34	40	0	0	
2014 Greenville-Anderson-Mauldin SC MSA	284	359	0	0	
2014 Greenwood County SC	22	25	0	0	
2014 Hilton Head Island-Bluffton-Beaufort SC MSA	22	29	0	0	
2014 Northern Non-MSA SC	92	119	0	0	
2014 Oconee County SC	52	62	0	0	
2014 Spartanburg SC MSA	39	48	0	0	

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\* The evaluation period for Optional Product Line(s) is from January 01, 2014 to June 30, 2015.

**Table 4. Geographic Distribution of Home Mortgage Refinance Loans**

Geographic Distribution: HOME MORTGAGE REFINANCE			Geography: SOUTH CAROLINA				Evaluation Period: JANUARY 1, 2014 TO JUNE 30, 2015					Market Share (%) by Geography*				
Assessment Area:	Total Home Mortgage Refinance Loans		Low-Income Geographies		Moderate-Income Geographies		Middle-Income Geographies		Upper-Income Geographies							
	#	% of Total**	% Owner Occ Units***	% BANK Loans****	% Owner Occ Units***	% BANK Loans	% Owner Occ Units***	% BANK Loans	% Owner Occ Units***	% BANK Loans	Overall	Low	Mod	Mid	Upp	
<b>Full Review:</b>																
2014 Columbia SC MSA	37	19.37	0.99	2.70	26.09	27.03	38.73	48.65	34.19	21.62	0.52	2.50	0.88	0.67	0.26	
<b>Limited Review:</b>																
2014 Augusta-Richmond County SC MSA	22	11.52	2.04	4.55	24.17	31.82	42.10	50.00	31.68	13.64	1.54	4.35	2.21	2.12	0.47	
2014 Charleston-North Charleston SC MSA	31	16.23	1.72	9.68	18.29	25.81	48.73	48.39	31.26	16.13	0.45	3.30	0.82	0.46	0.19	
2014 Cherokee County SC	3	1.57	0.00	0.00	11.16	0.00	59.87	100.00	28.97	0.00	1.14	0.00	0.00	1.92	0.00	
2014 Colleton County SC	0	0.00	0.00	0.00	35.45	0.00	57.53	0.00	7.02	0.00	0.00	0.00	0.00	0.00	0.00	
2014 Greenville-Anderson-Mauldin SC MSA	39	20.42	2.73	7.69	17.67	15.38	50.79	53.85	28.82	23.08	0.59	2.88	0.63	0.68	0.37	
2014 Greenwood County SC	3	1.57	3.22	0.00	0.00	0.00	51.28	33.33	45.50	66.67	0.73	0.00	0.00	0.50	1.00	
2014 Hilton Head Island-Bluffton-Beaufort SC MSA	22	11.52	0.80	0.00	19.36	13.64	37.26	54.55	42.58	31.82	0.64	0.00	1.23	0.59	0.50	
2014 Northern Non-MSA SC	11	5.76	0.00	0.00	23.74	36.36	74.57	54.55	1.69	9.09	1.44	0.00	2.94	1.08	0.00	
2014 Oconee County SC	4	2.09	0.00	0.00	0.00	0.00	41.90	50.00	58.10	50.00	0.86	0.00	0.00	1.27	0.66	
2014 Spartanburg SC MSA	19	9.95	2.34	0.00	17.57	15.79	54.13	42.11	25.96	42.11	0.91	0.00	1.16	0.74	1.08	

\* Based on 2014 Peer Mortgage Data – US and PR

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

\*\*\* Percentage of Owner Occupied Units is the number of owner occupied units in a particular geography divided by the number of owner occupied housing units in the area based on 2010 Census information.

\*\*\*\* Data shown includes only One to Four-family and manufactured housing. (Property type of 1 or 2)

**Table 6. Geographic Distribution of Small Loans to Businesses**

Geographic Distribution: SMALL LOANS TO BUSINESSES			Geography: SOUTH CAROLINA				Evaluation Period: JANUARY 1, 2014 TO JUNE 30, 2015					Market Share (%) by Geography*				
Assessment Area:	Total Small Business Loans		Low-Income Geographies		Moderate-Income Geographies		Middle-Income Geographies		Upper-Income Geographies		Overall	Low	Mod	Mid	Upp	
	#	% of Total**	% of Businesses***	% BANK Loans	% of Businesses***	% BANK Loans	% of Businesses***	% BANK Loans	% of Businesses***	% BANK Loans						
<b>Full Review:</b>																
2014 Columbia SC MSA	24	35.29	2.63	0.00	24.17	33.33	39.01	45.83	33.40	20.83	0.12	0.00	0.15	0.18	0.07	
<b>Limited Review:</b>																
2014 Augusta-Richmond County SC MSA	3	4.41	4.64	0.00	23.85	33.33	40.78	33.33	30.44	33.33	0.12	0.00	0.29	0.15	0.00	
2014 Charleston-North Charleston SC MSA	6	8.82	4.39	0.00	22.52	66.67	41.10	0.00	31.92	33.33	0.05	0.00	0.18	0.00	0.04	
2014 Cherokee County SC	1	1.47	0.00	0.00	13.55	0.00	49.31	0.00	37.15	100.00	0.00	0.00	0.00	0.00	0.00	
2014 Colleton County SC	1	1.47	0.00	0.00	30.96	0.00	61.23	100.00	7.81	0.00	0.00	0.00	0.00	0.00	0.00	
2014 Greenville-Anderson-Mauldin SC MSA	25	36.76	4.60	12.00	19.86	20.00	41.02	48.00	34.51	20.00	0.15	0.44	0.14	0.18	0.11	
2014 Greenwood County SC	0	0.00	5.77	0.00	0.00	0.00	41.75	0.00	52.48	0.00	0.00	0.00	0.00	0.00	0.00	
2014 Hilton Head Island-Bluffton-Beaufort SC MSA	1	1.47	4.13	0.00	15.39	100.00	35.71	0.00	44.77	0.00	0.03	0.00	0.23	0.00	0.00	
2014 Northern Non-MSA SC	5	7.35	0.00	0.00	25.08	40.00	73.38	60.00	1.55	0.00	0.46	0.00	0.76	0.42	0.00	
2014 Oconee County SC	2	2.94	0.00	0.00	0.00	0.00	40.54	100.00	59.46	0.00	0.25	0.00	0.00	0.79	0.00	
2014 Spartanburg SC MSA	0	0.00	3.40	0.00	21.49	0.00	45.74	0.00	29.37	0.00	0.00	0.00	0.00	0.00	0.00	

\* Based on 2014 Peer Small Business Data – US and PR

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

\*\*\* Source Data - Dun and Bradstreet (2014).

**Table 10. Borrower Distribution of Home Mortgage Refinance Loans**

Borrower Distribution: HOME MORTGAGE REFINANCE		Geography: SOUTH CAROLINA					Evaluation Period: JANUARY 1, 2014 TO JUNE 30, 2015					Market Share*				
Assessment Area:	Total Home Mortgage Refinance Loans		Low-Income Borrowers		Moderate-Income Borrowers		Middle-Income Borrowers		Upper-Income Borrowers		Overall	Low	Mod	Mid	Upp	
	#	% of Total**	% Families***	% BANK Loans**	% Families <sup>42</sup>	% BANK Loans**	% Families***	% BANK Loans**	% Families***	% BANK Loans**						
<b>Full Review:</b>																
2014 Columbia SC MSA	37	19.37	21.79	29.73	17.48	29.73	20.36	16.22	40.37	24.32	0.73	1.93	1.21	0.71	0.38	
<b>Limited Review:</b>																
2014 Augusta-Richmond County SC MSA	22	11.52	22.87	13.64	15.49	9.09	18.45	31.82	43.19	45.45	2.11	1.16	1.65	2.91	2.04	
2014 Charleston-North Charleston SC MSA	31	16.23	21.72	22.58	17.11	22.58	20.37	16.13	40.80	38.71	0.59	2.03	0.84	0.43	0.42	
2014 Cherokee County SC	3	1.57	19.34	33.33	17.47	0.00	19.57	0.00	43.63	66.67	1.43	5.88	0.00	0.00	2.00	
2014 Colleton County SC	0	0.00	24.90	0.00	16.71	0.00	19.31	0.00	39.08	0.00	0.00	0.00	0.00	0.00	0.00	
2014 Greenville-Anderson-Mauldin SC MSA	39	20.42	21.97	33.33	16.95	15.38	19.89	23.08	41.19	28.21	0.73	2.90	0.74	0.65	0.39	
2014 Greenwood County SC	3	1.57	18.00	0.00	16.55	66.67	17.31	33.33	48.13	0.00	0.88	0.00	4.35	1.22	0.00	
2014 Hilton Head Island-Bluffton-Beaufort SC MSA	22	11.52	18.57	9.09	17.60	27.27	20.67	22.73	43.17	40.91	0.80	1.16	1.61	1.02	0.49	
2014 Northern Non-MSA SC	11	5.76	27.97	0.00	18.79	0.00	17.87	27.27	35.36	72.73	1.72	0.00	0.00	0.00	3.27	
2014 Oconee County SC	4	2.09	15.36	0.00	15.90	0.00	18.02	50.00	50.72	50.00	1.01	0.00	0.00	2.78	0.75	
2014 Spartanburg SC MSA	19	9.95	21.63	31.58	17.59	42.11	20.36	10.53	40.42	15.79	1.11	4.79	1.45	0.46	0.40	

\* Based on 2014 Peer Mortgage Data – US and PR

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

\*\*\* Percentage of Families is based on the 2010 Census information.

\*\*\*\* As a percentage of loans with borrower income information available. No information was available for 0.0% of loans originated and purchased by bank.

42 Data shown includes only One to Four-family and manufactured housing. (Property type of 1 or 2)

**Table 11. Borrower Distribution of Small Loans to Businesses**

Borrower Distribution: SMALL LOANS TO BUSINESSES			Geography: SOUTH CAROLINA		Evaluation Period: JANUARY 1, 2014 TO JUNE 30, 2015				
Assessment Area:	Total Small Loans to Businesses		Businesses With Revenues of \$1 million or less		Loans by Original Amount Regardless of Business Size			Market Share*	
	#	% of Total**	% of Businesses***	% BANK Loans****	\$100,000 or less	>\$100,000 to \$250,000	>\$250,000 to \$1,000,000	All	Rev\$ 1 Million or Less
<b>Full Review:</b>									
2014 Columbia SC MSA	24	35.29	70.31	100.00	100.00	0.00	0.00	0.12	0.26
<b>Limited Review:</b>									
2014 Augusta-Richmond County SC MSA	3	4.41	71.61	100.00	100.00	0.00	0.00	0.12	0.24
2014 Charleston-North Charleston SC MSA	6	8.82	70.90	33.33	33.33	66.67	0.00	0.05	0.03
2014 Cherokee County SC	1	1.47	67.39	100.00	100.00	0.00	0.00	0.00	0.00
2014 Colleton County SC	1	1.47	74.19	100.00	100.00	0.00	0.00	0.00	0.00
2014 Greenville-Anderson-Mauldin SC MSA	25	36.76	69.19	100.00	100.00	0.00	0.00	0.15	0.31
2014 Greenwood County SC	0	0.00	67.87	0.00	0.00	0.00	0.00	0.00	0.00
2014 Hilton Head Island-Bluffton-Beaufort SC MSA	1	1.47	73.86	100.00	100.00	0.00	0.00	0.03	0.06
2014 Northern Non-MSA SC	5	7.35	71.21	100.00	100.00	0.00	0.00	0.46	1.08
2014 Oconee County SC	2	2.94	74.44	100.00	100.00	0.00	0.00	0.25	0.50
2014 Spartanburg SC MSA	0	0.00	67.70	0.00	0.00	0.00	0.00	0.00	0.00

\* Based on 2014 Peer Small Business Data – US and PR

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

\*\*\* Businesses with revenues of \$1 million or less as a percentage of all businesses (Source D&B - 2014).

\*\*\*\* Small loans to businesses with revenues of \$1 million or less as a percentage of all loans reported as small loans to businesses. No information was available for 2.94% of small loans to businesses originated and purchased by the bank.

**Table 13. Geographic and Borrower Distribution of Consumer Loans**

Geographic and Borrower Distribution: CONSUMER LOANS																			Geography: SOUTH CAROLINA																			Evaluation Period: JANUARY 1, 2014 TO JUNE 30, 2015																		
Assessment Area:	Geographic Distribution										Borrower Distribution																																													
	Total Consumer Loans		Low-Income Geographies		Moderate-Income Geographies		Middle-Income Geographies		Upper-Income Geographies		Low-Income Borrowers		Moderate-Income Borrowers		Middle-Income Borrowers		Upper-Income Borrowers																																							
	#	% of Total*	% of Hhlds**	% of BANK Loans	% of Hhlds**	% of BANK Loans	% of Hhlds**	% of BANK Loans	% of Hhlds**	% of BANK Loans	% of Hhlds**	% of BANK Loans	% of Hhlds**	% of BANK Loans	% of Hhlds**	% of BANK Loans	% of Hhlds**	% of BANK Loans																																						
<b>Full Review:</b>																																																								
2014 Columbia SC MSA	198	22.89	3.65	4.55	29.21	35.35	37.26	40.91	29.83	19.19	23.70	68.69	16.67	17.68	17.95	10.10	41.67	3.54																																						
<b>Limited Review:</b>																																																								
2014 Augusta-Richmond County SC MSA	44	5.09	3.39	6.82	26.68	43.18	40.97	34.09	28.96	15.91	25.61	65.91	15.79	11.36	14.96	9.09	43.64	13.64																																						
2014 Charleston-North Charleston SC MSA	47	5.43	4.26	6.38	21.96	36.17	47.33	44.68	26.45	12.77	23.86	55.32	15.81	17.02	19.06	23.40	41.26	4.26																																						
2014 Cherokee County SC	31	3.58	0.00	0.00	17.68	12.90	55.32	61.29	27.00	25.81	25.69	35.48	16.15	41.94	16.03	16.13	42.13	6.45																																						
2014 Colleton County SC	34	3.93	0.00	0.00	37.35	52.94	56.25	44.12	6.41	2.94	25.66	38.24	16.54	32.35	17.55	20.59	40.25	8.82																																						
2014 Greenville-Anderson-Mauldin SC MSA	284	32.83	4.87	11.97	22.14	31.34	47.13	44.72	25.85	11.97	24.67	67.61	16.23	19.37	17.23	8.80	41.87	4.23																																						
2014 Greenwood County SC	22	2.54	7.73	13.64	0.00	0.00	51.61	63.64	40.67	22.73	20.51	45.45	14.52	40.91	17.62	13.64	47.35	0.00																																						
2014 Hilton Head Island-Bluffton-Beaufort SC MSA	22	2.54	1.69	0.00	24.84	68.18	35.44	18.18	38.03	13.64	19.75	59.09	17.45	18.18	19.40	13.64	43.41	9.09																																						
2014 Northern Non-MSA SC	92	10.64	0.00	0.00	26.65	29.35	71.74	70.65	1.62	0.00	29.48	61.96	17.43	17.39	15.67	11.96	37.42	8.70																																						
2014 Oconee County SC	52	6.01	0.00	0.00	0.00	0.00	44.16	57.69	55.84	42.31	19.85	55.77	12.86	26.92	16.48	7.69	50.81	9.62																																						
2014 Spartanburg SC MSA	39	4.51	4.76	7.69	21.35	38.46	50.92	51.28	22.97	2.56	25.03	56.41	15.73	28.21	16.98	7.69	42.26	7.69																																						

\* Consumer Loans originated and purchased in the MA/AA as a percentage of all consumer loans originated and purchased in the rated area.

\*\* Percentage of households is based on 2010 Census Information.



**Table 14. Qualified Investments**

QUALIFIED INVESTMENTS		Geography: SOUTH CAROLINA				Evaluation Period: JUNE 24, 2012 TO JULY 13, 2015			
Assessment Area:	Prior Period Investments*		Current Period Investments		Total Investments			Unfunded Commitments**	
	#	\$(000's)	#	\$(000's)	#	\$(000's)	% of Total	#	\$(000's)
<b>Full Review:</b>									
2014 Columbia SC MSA	2	25	12	933	14	958	36.65	0	0
<b>Limited Review:</b>									
2014 Augusta-Richmond County SC MSA	0	0	2	281	2	281	10.75	0	0
2014 Charleston-North Charleston SC MSA	0	0	1	104	1	104	3.98	0	0
2014 Cherokee County SC	0	0	1	59	1	59	2.26	0	0
2014 Colleton County SC	0	0	1	110	1	110	4.21	0	0
2014 Greenville-Anderson-Mauldin SC MSA	0	0	5	551	5	551	21.08	0	0
2014 Greenwood County SC	0	0	2	162	2	162	6.20	0	0
2014 Hilton Head Island-Bluffton-Beaufort SC MSA	0	0	1	69	1	69	2.64	0	0
2014 Northern Non-MSA SC	0	0	1	133	1	133	5.08	0	0
2014 Oconee County SC	0	0	1	85	1	85	3.25	0	0
2014 Spartanburg SC MSA	0	0	2	102	2	102	3.90	0	0

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

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

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

DISTRIBUTION OF BRANCH DELIVERY SYSTEM AND BRANCH OPENINGS/CLOSINGS Geography: SOUTH CAROLINA Evaluation Period: JANUARY 1, 2014 TO JUNE 30, 2015																	
MA/Assessment Area:	Deposits	Branches						Branch Openings/Closings						Population			
	% of Rated Area Deposits in AA	# of BANK Branches	% of Rated Area Branches in AA	Location of Branches by Income of Geographies (%)				# of Branch Openings	# of Branch Closings	Net change in Location of Branches (+ or -)				% of Population within Each Geography			
				Low	Mod	Mid	Upp			Low	Mod	Mid	Upp	Low	Mod	Mid	Upp
<b>Full Review:</b>																	
2014 Columbia SC MSA	21.18	5	18.51	0.00	20.00	40.00	40.00	0	0	0	0	0	0	3.58	27.81	36.13	30.18
<b>Limited Review:</b>																	
2014 Augusta-Richmond County SC MSA	7.09	2	7.40	0.00	0.00	50.00	50.00	0	0	0	0	0	0	3.69	27.79	41.07	27.45
2014 Charleston-North Charleston SC MSA	7.28	2	7.40	0.00	0.00	50.00	50.00	0	0	0	0	0	0	3.98	22.83	46.90	26.29
2014 Cherokee County SC	3.38	1	3.71	0.00	0.00	100.00	0.00	0	0	0	0	0	0	0.00	17.12	55.63	27.26
2014 Colleton County SC	2.98	1	3.71	0.00	0.00	100.00	0.00	0	0	0	0	0	0	0.00	39.84	55.22	4.94
2014 Greenville-Anderson-Mauldin SC MSA	34.18	8	29.63	0.00	62.50	0.00	37.50	0	0	0	0	0	0	4.63	20.83	47.07	27.48
2014 Greenwood County SC	2.67	1	3.71	0.00	0.00	0.00	100.00	0	0	0	0	0	0	7.22	0.00	51.41	41.37
2014 Hilton Head Island-Bluffton-Beaufort SC MSA	3.80	1	3.71	0.00	100.00	0.00	0.00	0	0	0	0	0	0	1.94	25.97	38.22	33.86
2014 Northern Non-MSA SC	7.56	3	11.11	0.00	0.00	100.00	0.00	0	0	0	0	0	0	0.00	26.09	70.22	3.69
2014 Oconee County SC	5.11	1	3.71	0.00	0.00	0.00	100.00	0	0	0	0	0	0	0.00	0.00	45.12	54.88
2014 Spartanburg SC MSA	4.75	2	7.40	0.00	50.00	0.00	50.00	0	0	0	0	0	0	4.79	21.48	50.60	23.13

Table 1. Lending Volume

LENDING VOLUME		Geography: VIRGINIA				Evaluation Period: JANUARY 1, 2014 TO JUNE 30, 2015						
Assessment Area (2014):	% of Rated Area Loans (#) in MA/AA*	Home Mortgage		Small Loans to Businesses		Small Loans to Farms		Community Development Loans**		Total Reported Loans		% of Rated Area Deposits in MA/AA***
		#	\$ (000's)	#	\$ (000's)	#	\$ (000's)	#	\$ (000's)	#	\$ (000's)	
<b>Full Review:</b>												
2014 Richmond VA MSA	13.32	23	3,271	21	263	0	0	5	630	49	4,164	17.25
<b>Limited Review:</b>												
2014 Accomack County VA	0.82	2	159	0	0	0	0	1	5	3	164	0.56
2014 Blacksburg-Christiansburg-Radford VA MSA	7.61	26	3,181	1	3	0	0	1	20	28	3,204	3.34
2014 Central Non-MSA VA	1.08	2	172	1	3	0	0	1	5	4	180	1.54
2014 Harrisonburg VA MSA	6.79	22	3,334	2	41	0	0	1	9	25	3,384	1.41
2014 Kingsport-Bristol VA MSA	1.63	5	665	0	0	0	0	1	5	6	670	1.27
2014 Lee and Wise Counties and Norton City VA	1.63	3	247	2	6	0	0	1	15	6	268	3.18
2014 Louisa County VA	7.34	23	3,993	2	6	0	0	2	258	27	4,257	2.18
2014 Lynchburg VA MSA	9.51	29	3,031	4	5	0	0	2	65	35	3,101	10.30
2014 Northumberland-Lancaster-Middlesex Count VA	1.08	0	0	3	4	0	0	1	8	4	12	2.15
2014 Prince Edward and Cumberland Counties VA	0.82	1	68	1	3	0	0	1	8	3	79	1.48
2014 Roanoke VA MSA	9.24	25	2,963	8	17	0	0	1	40	34	3,020	8.58
2014 Southwest Non-MSA VA	12.50	33	3,299	12	15	0	0	1	50	46	3,364	12.97
2014 Staunton-Waynesboro VA MSA	8.70	23	3,128	8	14	0	0	1	20	32	3,162	3.19
2014 Virginia Beach-Norfolk-Newport News VA MSA	17.93	34	3,648	31	178	0	0	1	100	66	3,926	30.59

\* Loan Data as of June 30, 2015. Rated area refers to either state or multistate MA rating area.

\*\* The evaluation period for Community Development Loans is from January 01, 2014 to July 13, 2015.

\*\*\* Deposit Data as of June 30, 2014. Rated Area refers to either the state, multistate MA, or institution, as appropriate.

Table 1. Other Products

LENDING VOLUME		Geography: VIRGINIA		Evaluation Period: JANUARY 1, 2014 TO JUNE 30, 2015	
Assessment Area (2014):	Other Unsecured Consumer Loans*		Other Optional Loans*		
	#	\$ (000's)	#	\$ (000's)	
<b>Full Review:</b>					
2014 Richmond VA MSA	217	269	0	0	
<b>Limited Review:</b>					
2014 Accomack County VA	16	18	0	0	
2014 Blacksburg-Christiansburg-Radford VA MSA	47	63	0	0	
2014 Central Non-MSA VA	25	34	0	0	
2014 Harrisonburg VA MSA	39	46	0	0	
2014 Kingsport-Bristol VA MSA	20	21	0	0	
2014 Lee and Wise Counties and Norton City VA	68	86	0	0	
2014 Louisa County VA	23	29	0	0	
2014 Lynchburg VA MSA	169	204	0	0	
2014 Northumberland-Lancaster-Middlesex Count VA	25	34	0	0	
2014 Prince Edward and Cumberland Counties VA	28	30	0	0	
2014 Roanoke VA MSA	111	153	0	0	
2014 Southwest Non-MSA VA	445	550	0	0	
2014 Staunton-Waynesboro VA MSA	62	84	0	0	
2014 Virginia Beach-Norfolk-Newport News VA MSA	400	537	0	0	

\* The evaluation period for Optional Product Line(s) is from January 01, 2014 to June 30, 2015.

Table 4. Geographic Distribution of Home Mortgage Refinance Loans

Geographic Distribution: HOME MORTGAGE REFINANCE				Geography: VIRGINIA				Evaluation Period: JANUARY 1, 2014 TO JUNE 30, 2015							
Assessment Area:	Total Home Mortgage Refinance Loans		Low-Income Geographies		Moderate-Income Geographies		Middle-Income Geographies		Upper-Income Geographies		Market Share (%) by Geography*				
	#	% of Total**	% Owner Occ Units***	% BANK Loans****	% Owner Occ Units***	% BANK Loans	% Owner Occ Units***	% BANK Loans	% Owner Occ Units***	% BANK Loans	Overall	Low	Mod	Mid	Upp
<b>Full Review:</b>															
2014 Richmond VA MSA	22	9.24	3.79	4.55	14.55	22.73	35.81	27.27	45.85	45.45	0.22	0.34	0.39	0.17	0.20
<b>Limited Review:</b>															
2014 Accomack County VA	1	0.42	0.00	0.00	0.00	0.00	72.86	100.00	27.14	0.00	0.40	0.00	0.00	0.60	0.00
2014 Blacksburg-Christiansburg-Radford VA	24	10.08	0.00	0.00	18.54	29.17	60.63	58.33	20.84	12.50	1.36	0.00	3.05	1.20	0.65
2014 Central Non-MSA VA	2	0.84	0.00	0.00	0.00	0.00	66.58	100.00	33.42	0.00	0.72	0.00	0.00	1.23	0.00
2014 Harrisonburg VA MSA	22	9.24	0.00	0.00	8.46	13.64	69.10	68.18	22.45	18.18	0.87	0.00	1.92	0.91	0.49
2014 Kingsport-Bristol VA	5	2.10	2.55	0.00	14.82	20.00	72.47	40.00	10.16	40.00	0.67	0.00	0.00	0.47	2.22
2014 Lee and Wise Counties and Norton City VA	3	1.26	0.00	0.00	39.92	33.33	53.89	0.00	6.19	66.67	0.98	0.00	0.83	0.00	7.41
2014 Louisa County VA	23	9.66	0.00	0.00	0.00	0.00	20.86	26.09	79.14	73.91	2.89	0.00	0.00	2.86	2.89
2014 Lynchburg VA MSA	27	11.34	1.09	3.70	14.66	25.93	65.24	55.56	19.01	14.81	1.05	6.67	1.68	0.96	0.82
2014 Northumberland-Lancaster-Middlesex Count	0	0.00	0.00	0.00	0.00	0.00	26.62	0.00	73.38	0.00	0.00	0.00	0.00	0.00	0.00
2014 Prince Edward and Cumberland Counties VA	1	0.42	0.12	0.00	18.13	0.00	81.75	100.00	0.00	0.00	0.52	0.00	0.00	0.63	0.00
2014 Roanoke VA MSA	25	10.50	1.87	8.00	20.68	16.00	42.48	48.00	34.97	28.00	0.80	4.76	0.80	0.86	0.60
2014 Southwest Non-MSA	30	12.61	0.29	0.00	14.55	6.67	81.62	90.00	3.55	3.33	1.34	0.00	0.41	1.50	1.09
2014 Staunton-Waynesboro	20	8.40	0.40	0.00	8.01	15.00	71.79	75.00	19.80	10.00	0.67	0.00	1.01	0.72	0.40
2014 Virginia Beach-Norfolk-Newport News VA MSA	33	13.87	1.92	3.03	16.76	30.30	39.51	36.36	41.81	30.30	0.17	0.30	0.33	0.16	0.13

\* Based on 2014 Peer Mortgage Data – US and PR

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

\*\*\* Percentage of Owner Occupied Units is the number of owner occupied units in a particular geography divided by the number of owner occupied housing units in the area based on 2010 Census information.

\*\*\*\* Data shown includes only One to Four-family and manufactured housing. (Property type of 1 or 2)

**Table 6. Geographic Distribution of Small Loans to Businesses**

Geographic Distribution: SMALL LOANS TO BUSINESSES			Geography: VIRGINIA				Evaluation Period: JANUARY 1, 2014 TO JUNE 30, 2015					Market Share (%) by Geography*				
Assessment Area:	Total Small Business Loans		Low-Income Geographies		Moderate-Income Geographies		Middle-Income Geographies		Upper-Income Geographies		Overall	Low	Mod	Mid	Upp	
	#	% of Total**	% of Businesses ***	% BANK Loans	% of Businesses ***	% BANK Loans	% of Businesses ***	% BANK Loans	% of Businesses ***	% BANK Loans						
<b>Full Review:</b>																
2014 Richmond VA MSA	21	21.88	5.11	4.76	19.05	47.62	32.81	19.05	42.92	28.57	0.07	0.11	0.15	0.02	0.06	
<b>Limited Review:</b>																
2014 Accomack County VA	0	0.00	0.00	0.00	0.00	0.00	59.14	0.00	40.19	0.00	0.00	0.00	0.00	0.00	0.00	
2014 Blacksburg-Christiansburg-Radford VA MSA	1	1.04	0.00	0.00	16.82	0.00	58.55	0.00	22.81	100.00	0.00	0.00	0.00	0.00	0.00	
2014 Central Non-MSA VA	1	1.04	0.00	0.00	0.00	0.00	54.13	0.00	45.87	100.00	0.00	0.00	0.00	0.00	0.00	
2014 Harrisonburg VA MSA	2	2.08	0.00	0.00	10.37	50.00	68.08	50.00	21.55	0.00	0.12	0.00	0.52	0.10	0.00	
2014 Kingsport-Bristol VA MSA	0	0.00	1.40	0.00	18.22	0.00	69.21	0.00	11.18	0.00	0.00	0.00	0.00	0.00	0.00	
2014 Lee and Wise Counties and Norton City VA	2	2.08	0.00	0.00	41.29	0.00	52.66	100.00	6.05	0.00	0.40	0.00	0.00	0.80	0.00	
2014 Louisa County VA	2	2.08	0.00	0.00	0.00	0.00	27.19	0.00	72.81	100.00	0.58	0.00	0.00	0.00	0.79	
2014 Lynchburg VA MSA	4	4.17	4.79	25.00	19.18	50.00	56.06	25.00	19.97	0.00	0.06	0.00	0.23	0.06	0.00	
2014 Northumberland-Lancaster-Middlesex Count VA	3	3.13	0.00	0.00	0.00	0.00	23.90	0.00	76.10	100.00	0.40	0.00	0.00	0.00	0.57	
2014 Prince Edward and Cumberland Counties VA	1	1.04	1.14	0.00	28.83	0.00	70.03	100.00	0.00	0.00	0.32	0.00	0.00	0.48	0.00	
2014 Roanoke VA MSA	8	8.33	3.02	25.00	20.34	0.00	40.17	25.00	36.47	50.00	0.12	0.61	0.00	0.12	0.14	
2014 Southwest Non-MSA VA	12	12.50	1.87	0.00	14.41	33.33	78.02	58.33	5.63	8.33	0.26	0.00	0.83	0.16	0.41	
2014 Staunton-Waynesboro VA	8	8.33	5.34	0.00	7.06	12.50	64.78	87.50	22.82	0.00	0.25	0.00	0.93	0.28	0.00	
2014 Virginia Beach-Norfolk-Newport News VA MSA	31	32.29	4.55	9.68	18.74	19.35	37.62	48.39	38.74	22.58	0.10	0.24	0.17	0.13	0.02	

\* Based on 2014 Peer Small Business Data – US and PR

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

\*\*\* Source Data - Dun and Bradstreet (2014).

**Table 10. Borrower Distribution of Home Mortgage Refinance Loans**

Borrower Distribution: HOME MORTGAGE REFINANCE			Geography: VIRGINIA				Evaluation Period: JANUARY 1, 2014 TO JUNE 30, 2015					Market Share*				
Assessment Area:	Total Home Mortgage Refinance Loans		Low-Income Borrowers		Moderate-Income Borrowers		Middle-Income Borrowers		Upper-Income Borrowers		Overall	Low	Mod	Mid	Upp	
	#	% of Total**	% Families***	% BANK Loans****	% Families***	% BANK Loans****	% Families***	% BANK Loans****	% Families***	% BANK Loans****						
<b>Full Review:</b>																
2014 Richmond VA	22	9.24	19.75	18.18	17.04	40.91	20.68	22.73	42.53	18.18	0.29	0.88	0.37	0.27	0.09	
<b>Limited Review:</b>																
2014 Accomack County VA	1	0.42	18.06	0.00	16.50	0.00	24.10	0.00	41.34	100.00	0.48	0.00	0.00	0.00	0.74	
2014 Blacksburg-Christiansburg-Radford VA MSA	24	10.08	21.57	20.83	16.75	37.50	21.31	12.50	40.37	29.17	1.68	5.00	3.26	0.00	1.13	
2014 Central Non-MSA VA	2	0.84	17.19	50.00	17.45	50.00	19.56	0.00	45.80	0.00	0.85	3.57	2.94	0.00	0.00	
2014 Harrisonburg VA MSA	22	9.24	18.08	13.64	20.29	27.27	21.76	22.73	39.87	36.36	1.08	0.00	4.14	0.00	0.35	
2014 Kingsport-Bristol VA MSA	5	2.10	23.34	0.00	16.70	0.00	20.65	60.00	39.31	40.00	0.75	0.00	0.00	1.32	0.86	
2014 Lee and Wise Counties and Norton City VA	3	1.26	25.46	0.00	21.35	33.33	18.05	33.33	35.13	33.33	1.13	0.00	1.89	1.43	0.86	
2014 Louisa County VA	23	9.66	13.57	0.00	14.81	4.35	17.61	39.13	54.01	56.52	3.49	0.00	4.26	5.62	3.03	
2014 Lynchburg VA MSA	27	11.34	20.43	18.52	18.65	33.33	20.95	22.22	39.96	25.93	1.34	2.91	1.77	1.68	0.55	
2014 Northumberland-Lancaster-Middlesex Count VA	0	0.00	14.16	0.00	14.85	0.00	20.12	0.00	50.87	0.00	0.00	0.00	0.00	0.00	0.00	
2014 Prince Edward and Cumberland Counties VA	1	0.42	18.82	0.00	17.07	0.00	21.57	100.00	42.55	0.00	0.65	0.00	0.00	2.13	0.00	
2014 Roanoke VA MSA	25	10.50	20.15	16.00	18.35	36.00	21.64	24.00	39.86	24.00	1.01	1.50	1.83	0.79	0.53	
2014 Southwest Non-MSA VA	30	12.61	23.86	16.67	19.31	13.33	22.40	23.33	34.43	46.67	1.60	1.28	1.62	2.41	1.13	

\* Based on 2014 Peer Mortgage Data – US and PR

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

\*\*\* Percentage of Families is based on the 2010 Census information.

\*\*\*\* As a percentage of loans with borrower income information available. No information was available for 0.0% of loans originated and purchased by bank.

**Table 10. Borrower Distribution of Home Mortgage Refinance Loans**

Borrower Distribution: HOME MORTGAGE REFINANCE			Geography: VIRGINIA						Evaluation Period: JANUARY 1, 2014 TO JUNE 30, 2015								
Assessment Area:	Total Home Mortgage Refinance Loans		Low-Income Borrowers		Moderate-Income Borrowers		Middle-Income Borrowers		Upper-Income Borrowers		Market Share*						
	#	% of Total**	% Families***	% BANK Loans****	% Families <sup>43</sup>	% BANK Loans****	% Families***	% BANK Loans****	% Families***	% BANK Loans****	% Families***	% BANK Loans****	Overall	Low	Mod	Mid	Upp
<b>Limited Review:</b>																	
2014 Staunton-Waynesboro VA MSA	20	8.40	19.67	5.00	17.69	20.00	23.66	35.00	38.98	40.00	0.84	0.94	1.21	0.82	0.56		
2014 Virginia Beach-Norfolk-Newport News VA MSA	33	13.87	19.18	21.21	18.15	33.33	22.11	39.39	40.56	6.06	0.27	0.55	0.60	0.35	0.02		

\* Based on 2014 Mortgage Peer Data – US and PR

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

\*\*\* Percentage of Families is based on the 2010 Census information.

\*\*\*\* As a percentage of loans with borrower income information available. No information was available for 0.0% of loans originated and purchased by bank.

<sup>43</sup> Data shown includes only One to Four-family and manufactured housing. (Property type of 1 or 2)



**Table 11. Borrower Distribution of Small Loans to Businesses**

Borrower Distribution: SMALL LOANS TO BUSINESSES			Geography: VIRGINIA		Evaluation Period: JANUARY 1, 2014 TO JUNE 30, 2015				
Assessment Area:	Total Small Loans to Businesses		Businesses With Revenues of \$1 million or less		Loans by Original Amount Regardless of Business Size			Market Share*	
	#	% of Total**	% of Businesses***	% BANK Loans****	\$100,000 or less	>\$100,000 to \$250,000	>\$250,000 to \$1,000,000	All	Rev\$ 1 Million or Less
<b>Full Review:</b>									
2014 Richmond VA MSA	21	21.88	71.19	85.71	90.48	9.52	0.00	0.07	0.11
<b>Limited Review:</b>									
2014 Accomack County VA	0	0.00	70.50	0.00	0.00	0.00	0.00	0.00	0.00
2014 Blacksburg-Christiansburg-Radford VA MSA	1	1.04	70.52	100.00	100.00	0.00	0.00	0.00	0.00
2014 Central Non-MSA VA	1	1.04	73.52	100.00	100.00	0.00	0.00	0.00	0.00
2014 Harrisonburg VA MSA	2	2.08	71.44	50.00	100.00	0.00	0.00	0.12	0.13
2014 Kingsport-Bristol VA MSA	0	0.00	69.96	0.00	0.00	0.00	0.00	0.00	0.00
2014 Lee and Wise Counties and Norton City VA	2	2.08	67.30	100.00	100.00	0.00	0.00	0.40	0.97
2014 Louisa County VA	2	2.08	78.99	100.00	100.00	0.00	0.00	0.58	1.17
2014 Lynchburg VA MSA	4	4.17	72.65	100.00	100.00	0.00	0.00	0.06	0.14
2014 Northumberland-Lancaster-Middlesex Count VA	3	3.13	76.31	100.00	100.00	0.00	0.00	0.40	0.86
2014 Prince Edward and Cumberland Counties VA	1	1.04	73.14	100.00	100.00	0.00	0.00	0.32	0.69
2014 Roanoke VA MSA	8	8.33	71.66	100.00	100.00	0.00	0.00	0.12	0.27
2014 Southwest Non-MSA VA	12	12.50	72.20	100.00	100.00	0.00	0.00	0.26	0.55

\* Based on 2014 Peer Small Business Data – US and PR

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

\*\*\* Businesses with revenues of \$1 million or less as a percentage of all businesses (Source D&B - 2014).

\*\*\*\* Small loans to businesses with revenues of \$1 million or less as a percentage of all loans reported as small loans to businesses. No information was available for 3.13% of small loans to businesses originated and purchased by the bank.

**Table 11. Borrower Distribution of Small Loans to Businesses**

Borrower Distribution: SMALL LOANS TO BUSINESSES		Geography: VIRGINIA			Evaluation Period: JANUARY 1, 2014 TO JUNE 30, 2015				
Assessment Area:	Total Small Loans to Businesses		Businesses With Revenues of \$1 million or less		Loans by Original Amount Regardless of Business Size			Market Share*	
	#	% of Total**	% of Businesses***	% BANK Loans****	\$100,000 or less	>\$100,000 to \$250,000	>\$250,000 to \$1,000,000	All	Rev\$ 1 Million or Less
<b>Limited Review:</b>									
2014 Staunton-Waynesboro VA MSA	8	8.33	71.85	87.50	100.00	0.00	0.00	0.25	0.52
2014 Virginia Beach-Norfolk-Newport News VA MSA	31	32.29	71.53	96.77	96.77	3.23	0.00	0.10	0.19

\* Based on 2014 Peer Small Business Data – US and PR

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

\*\*\* Businesses with revenues of \$1 million or less as a percentage of all businesses (Source D&B - 2014).

\*\*\*\* Small loans to businesses with revenues of \$1 million or less as a percentage of all loans reported as small loans to businesses. No information was available for 3.13% of small loans to businesses originated and purchased by the bank.

**Table 13. Geographic and Borrower Distribution of Consumer Loans**

Geographic and Borrower Distribution: CONSUMER LOANS																			Geography: VIRGINIA				Evaluation Period: JANUARY 1, 2014 TO JUNE 30, 2015			
Assessment Area:	Geographic Distribution										Borrower Distribution															
	Total Consumer Loans		Low-Income Geographies		Moderate-Income Geographies		Middle-Income Geographies		Upper-Income Geographies		Low-Income Borrowers		Moderate-Income Borrowers		Middle-Income Borrowers		Upper-Income Borrowers									
	#	% of Total*	% of Hhlds**	% of BANK Loans	% of Hhlds**	% of BANK Loans	% of Hhlds**	% of BANK Loans	% of Hhlds**	% of BANK Loans	% of Hhlds**	% of BANK Loans	% of Hhlds**	% of BANK Loans	% of Hhlds**	% of BANK Loans	% of Hhlds**	% of BANK Loans								
<b>Full Review:</b>																										
2014 Richmond VA MSA	217	12.80	7.65	14.29	20.62	35.02	34.14	32.72	37.59	17.97	21.97	70.51	16.62	18.89	18.59	7.37	42.81	3.23								
<b>Limited Review:</b>																										
2014 Accomack County VA	16	0.94	0.00	0.00	0.00	0.00	74.46	81.25	25.54	18.75	24.74	87.50	15.12	6.25	18.74	0.00	41.41	6.25								
2014 Blacksburg-Christiansburg-Radford VA MSA	47	2.77	0.00	0.00	17.82	29.79	55.71	55.32	26.47	14.89	26.97	61.70	14.15	23.40	16.90	10.64	41.99	4.26								
2014 Central Non-MSA VA	25	1.47	0.00	0.00	0.00	0.00	66.25	76.00	33.75	24.00	24.45	64.00	14.46	8.00	16.28	24.00	44.80	4.00								
2014 Harrisonburg VA MSA	39	2.30	0.00	0.00	13.13	25.64	68.17	61.54	18.69	12.82	23.48	76.92	16.33	17.95	19.28	5.13	40.90	0.00								
2014 Kingsport-Bristol VA MSA	20	1.18	3.30	10.00	16.46	30.00	70.73	60.00	9.52	0.00	25.39	80.00	15.78	10.00	18.14	10.00	40.70	0.00								
2014 Lee and Wise Counties and Norton City VA	68	4.01	0.00	0.00	41.25	41.18	52.84	54.41	5.90	4.41	29.78	61.76	17.95	20.59	16.80	5.88	35.47	11.76								
2014 Louisa County VA	23	1.36	0.00	0.00	0.00	0.00	23.02	34.78	76.98	65.22	16.68	60.87	10.81	17.39	16.34	17.39	56.18	4.35								
2014 Lynchburg VA MSA	169	9.97	2.00	2.96	18.01	24.26	63.39	68.05	16.60	4.73	24.00	71.60	16.03	18.34	17.93	7.69	42.04	2.37								
2014 Northumberland-Lancaster-Middlesex Count VA	25	1.47	0.00	0.00	0.00	0.00	27.20	24.00	72.80	76.00	16.22	44.00	13.54	20.00	17.95	28.00	52.29	8.00								
2014 Prince Edward and Cumberland Counties VA	28	1.65	0.08	0.00	22.60	32.14	77.32	67.86	0.00	0.00	24.32	64.29	18.95	28.57	16.01	7.14	40.72	0.00								

\* Consumer Loans originated and purchased in the MA/AA as a percentage of all consumer loans originated and purchased in the rated area.

\*\* Percentage of households is based on 2010 Census Information.

2014 Roanoke VA MSA	111	6.55	4.15	10.81	23.43	30.63	42.28	42.34	30.14	16.22	22.66	63.96	17.03	18.02	19.09	9.01	41.21	9.01
2014 Southwest Non-MSA VA	445	26.25	0.80	1.35	16.65	27.64	78.95	68.76	3.58	2.25	27.59	66.97	16.86	21.57	19.21	7.87	36.34	3.60

**Table 13. Geographic and Borrower Distribution of Consumer Loans**

Geographic and Borrower Distribution: CONSUMER LOANS																		Geography: VIRGINIA				Evaluation Period: JANUARY 1, 2014 TO JUNE 30, 2015			
Assessment Area:	Geographic Distribution										Borrower Distribution														
	Total Consumer Loans		Low-Income Geographies		Moderate-Income Geographies		Middle-Income Geographies		Upper-Income Geographies		Low-Income Borrowers		Moderate-Income Borrowers		Middle-Income Borrowers		Upper-Income Borrowers								
	#	% of Total*	% of Hhlds**	% of BANK Loans	% of Hhlds**	% of BANK Loans	% of Hhlds**	% of BANK Loans	% of Hhlds**	% of BANK Loans	% of Hhlds**	% of BANK Loans	% of Hhlds**	% of BANK Loans	% of Hhlds**	% of BANK Loans	% of Hhlds**	% of BANK Loans							
<b>Limited Review:</b>																									
2014 Staunton-Waynesboro VA MSA	62	3.66	1.14	1.61	11.65	25.81	69.34	62.90	17.87	9.68	24.39	67.74	15.80	14.52	19.00	14.52	40.80	3.23							
2014 Virginia Beach-Norfolk-Newport News VA MSA	400	23.60	4.48	7.75	23.50	31.25	38.53	42.25	33.48	18.75	21.69	67.25	17.32	16.75	19.86	11.00	41.13	5.00							

\* Consumer Loans originated and purchased in the MA/AA as a percentage of all consumer loans originated and purchased in the rated area.  
 \*\* Percentage of households is based on 2010 Census Information.

Table 14. Qualified Investments

QUALIFIED INVESTMENTS									
Geography: VIRGINIA									
Evaluation Period: JUNE 24, 2012 TO JULY 13, 2015									
Assessment Area:	Prior Period Investments*		Current Period Investments		Total Investments			Unfunded Commitments**	
	#	\$(000's)	#	\$(000's)	#	\$(000's)	% of Total	#	\$(000's)
<b>Full Review:</b>									
2014 Richmond VA MSA	5	1,278	6	190	11	1,468	31.50	0	0
<b>Limited Review:</b>									
2014 Accomack County VA	0	0	1	125	1	125	2.68	0	0
2014 Blacksburg-Christiansburg-Radford VA MSA	0	0	1	123	1	123	2.64	0	0
2014 Central Non-MSA VA	0	0	1	5	1	5	0.11	0	0
2014 Harrisonburg VA MSA	0	0	2	347	2	347	7.45	0	0
2014 Kingsport-Bristol VA MSA	0	0	1	76	1	76	1.63	0	0
2014 Lee and Wise Counties and Norton City VA	0	0	1	135	1	135	2.90	0	0
2014 Louisa County VA	0	0	3	199	3	199	4.27	0	0
2014 Lynchburg VA MSA	0	0	7	328	7	328	7.04	0	0
2014 Northumberland-Lancaster-Middlesex Count VA	0	0	1	76	1	76	1.63	0	0
2014 Prince Edward and Cumberland Counties VA	0	0	1	215	1	215	4.61	0	0
2014 Roanoke VA MSA	0	0	2	262	2	262	5.62	0	0
2014 Southwest Non-MSA VA	0	0	8	416	8	416	8.93	0	0

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

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

**Table 14. Qualified Investments**

QUALIFIED INVESTMENTS		Geography: VIRGINIA				Evaluation Period: JUNE 24, 2012 TO JULY 13, 2015			
Assessment Area:	Prior Period Investments*		Current Period Investments		Total Investments			Unfunded Commitments**	
	#	\$(000's)	#	\$(000's)	#	\$(000's)	% of Total	#	\$(000's)
<b>Limited Review:</b>									
2014 Staunton-Waynesboro VA MSA	0	0	4	334	4	334	7.17	0	0
2014 Virginia Beach-Norfolk-Newport News VA MSA	4	397	6	154	10	551	11.82	0	0

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

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

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

DISTRIBUTION OF BRANCH DELIVERY SYSTEM AND BRANCH OPENINGS/CLOSINGS																	
Geography: VIRGINIA Evaluation Period: JANUARY 1, 2014 TO JUNE 30, 2015																	
MA/Assessment Area:	Deposits	Branches						Branch Openings/Closings						Population			
	% of Rated Area Deposits in AA	# of BANK Branches	% of Rated Area Branches in AA	Location of Branches by Income of Geographies (%)				# of Branch Openings	# of Branch Closings	Net change in Location of Branches (+ or -)				% of Population within Each Geography			
				Low	Mod	Mid	Upp			Low	Mod	Mid	Upp	Low	Mod	Mid	Upp
<b>Full Review:</b>																	
2014 Richmond VA MSA	17.25	8	16.67	0.00	0.00	62.50	37.50	0	0	0	0	0	0	7.96	19.76	33.09	39.19
<b>Limited Review:</b>																	
2014 Accomack County VA	0.56	1	2.08	0.00	0.00	100.00	0.00	0	0	0	0	0	0	0.00	0.00	77.85	22.14
2014 Blacksburg-Christiansburg-Radford VA	3.34	2	4.17	0.00	0.00	50.00	50.00	0	1	0	0	-1	0	0.00	16.11	51.18	27.95
2014 Central Non-MSA VA	1.54	1	2.08	0.00	0.00	100.00	0.00	0	0	0	0	0	0	0.00	0.00	62.57	37.43
2014 Harrisonburg VA MSA	1.41	1	2.08	0.00	0.00	100.00	0.00	0	0	0	0	0	0	0.00	14.55	64.12	21.34
2014 Kingsport-Bristol VA	1.27	1	2.08	0.00	0.00	100.00	0.00	0	0	0	0	0	0	2.99	16.82	70.77	9.42
2014 Lee and Wise Counties and Norton City VA	3.18	2	4.17	0.00	0.00	100.00	0.00	0	0	0	0	0	0	0.00	41.46	51.13	7.41
2014 Louisa County VA	2.18	1	2.08	0.00	0.00	0.00	100.00	0	0	0	0	0	0	0.00	0.00	22.74	77.26
2014 Lynchburg VA MSA	10.30	4	8.33	0.00	25.00	75.00	0.00	0	0	0	0	0	0	2.11	19.69	61.32	16.88
2014 Northumberland-Lancaster-Middlesex Count	2.15	1	2.08	0.00	0.00	100.00	0.00	0	0	0	0	0	0	0.00	0.00	26.52	73.48
2014 Prince Edward and Cumberland Counties VA	1.48	1	2.08	0.00	0.00	100.00	0.00	0	0	0	0	0	0	7.18	19.99	72.84	0.00
2014 Roanoke VA MSA	8.58	4	8.33	0.00	25.00	25.00	25.00	0	0	0	0	0	0	4.27	23.38	41.62	30.73
2014 Southwest Non-MSA	12.97	5	10.42	0.00	20.00	60.00	20.00	0	0	0	0	0	0	0.76	16.19	79.73	3.32
2014 Staunton-Waynesboro VA MSA	3.19	2	4.17	0.00	0.00	50.00	50.00	0	0	0	0	0	0	1.03	11.42	68.28	19.27
2014 Virginia Beach-Norfolk-Newport News	30.59	14	29.18	14.29	21.42	50.00	14.29	0	0	0	0	0	0	4.91	22.62	37.44	35.03

: 2010 US Census and 2014 HUD updated MFI



**Table 1. Lending Volume**

LENDING VOLUME												
Geography: WEST VIRGINIA												
Evaluation Period: JANUARY 1, 2014 TO JUNE 30, 2015												
Assessment Area (2014):	% of Rated Area Loans (#) in MA/AA*	Home Mortgage		Small Loans to Businesses		Small Loans to Farms		Community Development Loans**		Total Reported Loans		% of Rated Area Deposits in MA/AA***
		#	\$ (000's)	#	\$ (000's)	#	\$ (000's)	#	\$ (000's)	#	\$(000's)	
<b>Full Review:</b>												
2014 Huntington-Ashland WV MSA	21.80	42	4,535	3	10	0	0	1	20	46	4,565	9.61
<b>Limited Review:</b>												
2014 Beckley WV MSA	16.59	32	3,534	2	4	0	0	1	60	35	3,598	19.04
2014 Charleston WV MSA	20.38	37	4,233	3	3	0	0	3	48	43	4,284	9.88
2014 Hagerstown-Martinsburg WV MSA	12.80	25	3,358	1	2	0	0	1	20	27	3,380	6.91
2014 Logan County WV	4.27	4	527	4	5	0	0	1	35	9	567	18.23
2014 Nicholas and Webster Counties WV	0.46	0	0	0	0	0	0	1	25	1	25	13.85
2014 Northern Non-MSA WV	23.70	45	4,813	4	6	0	0	1	55	50	4,874	22.48

\* Loan Data as of June 30, 2015. Rated area refers to either state or multistate MA rating area.

\*\* The evaluation period for Community Development Loans is from January 01, 2014 to December 31, 2014.

\*\*\* Deposit Data as of June 30, 2014. Rated Area refers to either the state, multistate MA, or institution, as appropriate.

**Table 1. Other Products**

LENDING VOLUME		Geography: WEST VIRGINIA						Evaluation Period: JANUARY 1, 2014 TO JUNE 30, 2015						
Assessment Area (2014):	% of Rated Area Loans (#) in MA/AA*	Total Optional Loans**		Small Business Real Estate Secured**		Home Equity**		Motor Vehicle**		Credit Card**		Other Secured Consumer**		% of Rated Area Deposits in AA***
		#	\$ (000's)	#	\$ (000's)	#	\$ (000's)	#	\$ (000's)	#	\$ (000's)	#	\$ (000's)	
<b>Full Review:</b>														
2014 Huntington-Ashland WV MSA	16.26	47	53	0	0	0	0	0	0	0	0	0	0	9.61
<b>Limited Review:</b>														
2014 Beckley WV MSA	16.26	47	62	0	0	0	0	0	0	0	0	0	0	19.04
2014 Charleston WV MSA	17.30	50	62	0	0	0	0	0	0	0	0	0	0	9.88
2014 Hagerstown-Martinsburg WV MSA	10.38	30	35	0	0	0	0	0	0	0	0	0	0	6.91
2014 Logan County WV	13.15	38	46	0	0	0	0	0	0	0	0	0	0	18.23
2014 Nicholas and Webster Counties WV	11.07	32	43	0	0	0	0	0	0	0	0	0	0	13.85
2014 Northern Non-MSA WV	15.57	45	57	0	0	0	0	0	0	0	0	0	0	22.48

\* Loan Data as of June 30, 2015. Rated area refers to either state or multistate MA rating area.

\*\* The evaluation period for Optional Product Line(s) is from January 01, 2014 to June 30, 2015.

\*\*\* Deposit Data as of June 30, 2014. Rated Area refers to either the state, multistate MA, or institution, as appropriate.

**Table 1. Other Products**

LENDING VOLUME		Geography: WEST VIRGINIA		Evaluation Period: JANUARY 1, 2014 TO JUNE 30, 2015	
Assessment Area (2014):	Other Unsecured Consumer Loans*		Other Optional Loans*		
	#	\$ (000's)	#	\$ (000's)	
<b>Full Review:</b>					
2014 Huntington-Ashland WV MSA	47	53	0	0	
<b>Limited Review:</b>					
2014 Beckley WV MSA	47	62	0	0	
2014 Charleston WV MSA	50	62	0	0	
2014 Hagerstown-Martinsburg WV MSA	30	35	0	0	
2014 Logan County WV	38	46	0	0	
2014 Nicholas and Webster Counties WV	32	43	0	0	
2014 Northern Non-MSA WV	45	57	0	0	

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\* The evaluation period for Optional Product Line(s) is from January 01, 2014 to June 30, 2015.

**Table 2. Geographic Distribution of Home Purchase Loans**

Geographic Distribution: HOME PURCHASE			Geography: WEST VIRGINIA						Evaluation Period: JANUARY 1, 2014 TO JUNE 30, 2015						
Assessment Area:	Total Home Purchase Loans		Low-Income Geographies		Moderate-Income Geographies		Middle-Income Geographies		Upper-Income Geographies		Market Share (%) by Geography*				
	#	% of Total**	% Owner Occ Units***	% BANK Loans****	% Owner Occ Units***	% BANK Loans	% Owner Occ Units***	% BANK Loans	% Owner Occ Units***	% BANK Loans	Overall	Low	Mod	Mid	Upp
<b>Full Review:</b>															
2014 Huntington-Ashland WV MSA	1	33.33	2.41	0.00	16.56	0.00	42.97	100.00	38.06	0.00	0.05	0.00	0.00	0.14	0.00
<b>Limited Review:</b>															
2014 Beckley WV MSA	1	33.33	0.00	0.00	10.23	0.00	71.66	100.00	18.11	0.00	0.10	0.00	0.00	0.13	0.00
2014 Charleston WV MSA	1	33.33	0.00	0.00	16.69	0.00	61.78	100.00	21.53	0.00	0.05	0.00	0.00	0.09	0.00
2014 Hagerstown-Martinsburg WV MSA	0	0.00	0.00	0.00	13.71	0.00	76.68	0.00	9.62	0.00	0.00	0.00	0.00	0.00	0.00
2014 Logan County WV	0	0.00	0.00	0.00	0.00	0.00	100.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
2014 Nicholas and Webster Counties WV	0	0.00	0.00	0.00	10.56	0.00	89.44	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
2014 Northern Non-MSA WV	0	0.00	0.08	0.00	4.95	0.00	62.44	0.00	32.54	0.00	0.00	0.00	0.00	0.00	0.00

\* Based on 2014 Peer Mortgage Data – US and PR

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

\*\*\* Percentage of Owner Occupied Units is the number of owner occupied units in a particular geography divided by the number of owner occupied housing units in the area based on 2010 Census information.

\*\*\*\* Data shown includes only One to Four-family and manufactured housing. (Property type of 1 or 2)

**Table 3. Geographic Distribution of Home Improvement Loans**

Geographic Distribution: HOME IMPROVEMENT			Geography: WEST VIRGINIA				Evaluation Period: JANUARY 1, 2014 TO JUNE 30, 2015					Market Share (%) by Geography*				
Assessment Area:	Total Home Improvement Loans		Low-Income Geographies		Moderate-Income Geographies		Middle-Income Geographies		Upper-Income Geographies							
	#	% of Total**	% Owner Occ Units***	% BANK Loans****	% Owner Occ Units***	% BANK Loans	% Owner Occ Units***	% BANK Loans	% Owner Occ Units***	% BANK Loans	Overall	Low	Mod	Mid	Upp	
<b>Full Review:</b>																
2014 Huntington-Ashland WV MSA	3	42.86	2.41	0.00	16.56	0.00	42.97	100.00	38.06	0.00	0.27	0.00	0.00	0.71	0.00	
<b>Limited Review:</b>																
2014 Beckley WV MSA	1	14.29	0.00	0.00	10.23	0.00	71.66	100.00	18.11	0.00	0.00	0.00	0.00	0.00	0.00	
2014 Charleston WV MSA	1	14.29	0.00	0.00	16.69	0.00	61.78	100.00	21.53	0.00	0.24	0.00	0.00	0.39	0.00	
2014 Hagerstown-Martinsburg WV MSA	0	0.00	0.00	0.00	13.71	0.00	76.68	0.00	9.62	0.00	0.00	0.00	0.00	0.00	0.00	
2014 Logan County WV	0	0.00	0.00	0.00	0.00	0.00	100.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	
2014 Nicholas and Webster Counties WV	0	0.00	0.00	0.00	10.56	0.00	89.44	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	
2014 Northern Non-MSA WV	2	28.57	0.08	0.00	4.95	0.00	62.44	50.00	32.54	50.00	0.69	0.00	0.00	0.61	0.95	

\* Based on 2014 Peer Mortgage Data – US and PR

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

\*\*\* Percentage of Owner Occupied Units is the number of owner occupied units in a particular geography divided by the number of owner occupied housing units in the area based on 2010 Census information.

\*\*\*\* Data shown includes only One to Four-family and manufactured housing. (Property type of 1 or 2)

**Table 4. Geographic Distribution of Home Mortgage Refinance Loans**

Geographic Distribution: HOME MORTGAGE REFINANCE			Geography: WEST VIRGINIA				Evaluation Period: JANUARY 1, 2014 TO JUNE 30, 2015					Market Share (%) by Geography*				
Assessment Area:	Total Home Mortgage Refinance Loans		Low-Income Geographies		Moderate-Income Geographies		Middle-Income Geographies		Upper-Income Geographies							
	#	% of Total**	% Owner Occ Units***	% BANK Loans****	% Owner Occ Units***	% BANK Loans	% Owner Occ Units***	% BANK Loans	% Owner Occ Units***	% BANK Loans	Overall	Low	Mod	Mid	Upp	
<b>Full Review:</b>																
2014 Huntington-Ashland WV MSA	38	21.71	2.41	2.63	16.56	15.79	42.97	26.32	38.06	55.26	1.93	0.00	2.38	1.61	2.18	
<b>Limited Review:</b>																
2014 Beckley WV MSA	30	17.14	0.00	0.00	10.23	10.00	71.66	70.00	18.11	20.00	2.74	0.00	1.59	3.17	1.57	
2014 Charleston WV MSA	35	20.00	0.00	0.00	16.69	22.86	61.78	51.43	21.53	25.71	1.86	0.00	3.87	1.55	1.66	
2014 Hagerstown-Martinsburg WV MSA	25	14.29	0.00	0.00	13.71	24.00	76.68	72.00	9.62	4.00	1.27	0.00	4.04	1.12	0.00	
2014 Logan County WV	4	2.29	0.00	0.00	0.00	0.00	100.00	100.00	0.00	0.00	3.17	0.00	0.00	3.17	0.00	
2014 Nicholas and Webster Counties WV	0	0.00	0.00	0.00	10.56	0.00	89.44	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	
2014 Northern Non-MSA WV	43	24.57	0.08	0.00	4.95	4.65	62.44	55.81	32.54	39.53	3.30	0.00	3.51	3.56	2.93	

\* Based on 2014 Peer Mortgage Data – US and PR

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

\*\*\* Percentage of Owner Occupied Units is the number of owner occupied units in a particular geography divided by the number of owner occupied housing units in the area based on 2010 Census information.

\*\*\*\* Data shown includes only One to Four-family and manufactured housing. (Property type of 1 or 2)

**Table 6. Geographic Distribution of Small Loans to Businesses**

Geographic Distribution: SMALL LOANS TO BUSINESSES 2015			Geography: WEST VIRGINIA						Evaluation Period: JANUARY 1, 2014 TO JUNE 30,						
Assessment Area:	Total Small Business Loans		Low-Income Geographies		Moderate-Income Geographies		Middle-Income Geographies		Upper-Income Geographies		Market Share (%) by Geography*				
	#	% of Total**	% of Businesses***	% BANK Loans	% of Businesses***	% BANK Loans	% of Businesses***	% BANK Loans	% of Businesses***	% BANK Loans	Overall	Low	Mod	Mid	Upp
<b>Full Review:</b>															
2014 Huntington-Ashland WV MSA	3	17.65	5.18	0.00	25.05	66.67	31.97	0.00	37.80	33.33	0.11	0.00	0.30	0.00	0.13
<b>Limited Review:</b>															
2014 Beckley WV MSA	2	11.76	0.00	0.00	12.34	0.00	70.93	50.00	16.73	50.00	0.07	0.00	0.00	0.10	0.00
2014 Charleston WV MSA	3	17.65	0.00	0.00	31.73	0.00	45.56	100.00	22.70	0.00	0.11	0.00	0.00	0.24	0.00
2014 Hagerstown-Martinsburg WV MSA	1	5.88	0.00	0.00	24.91	0.00	66.13	100.00	8.96	0.00	0.00	0.00	0.00	0.00	0.00
2014 Logan County WV	4	23.53	0.00	0.00	0.00	0.00	100.00	100.00	0.00	0.00	1.24	0.00	0.00	1.42	0.00
2014 Nicholas and Webster Counties WV	0	0.00	0.00	0.00	14.75	0.00	85.25	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
2014 Northern Non-MSA WV	4	23.53	2.58	0.00	11.48	0.00	51.26	75.00	34.68	25.00	0.10	0.00	0.00	0.12	0.15

\* Based on 2014 Peer Small Business Data – US and PR

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

\*\*\* Source Data - Dun and Bradstreet (2014).

**Table 8. Borrower Distribution of Home Purchase Loans**

Borrower Distribution: HOME PURCHASE			Geography: WEST VIRGINIA						Evaluation Period: JANUARY 1, 2014 TO JUNE 30, 2015						
Assessment Area:	Total Home Purchase Loans		Low-Income Borrowers		Moderate-Income Borrowers		Middle-Income Borrowers		Upper-Income Borrowers		Market Share*				
	#	% of Total**	% Families***	% BANK Loans****	% Families <sup>44</sup>	% BANK Loans****	% Families***	% BANK Loans****	% Families***	% BANK Loans****	Overall	Low	Mod	Mid	Upp
<b>Full Review:</b>															
2014 Huntington-Ashland WV MSA	1	33.33	21.36	100.00	17.32	0.00	18.83	0.00	42.49	0.00	0.06	1.12	0.00	0.00	0.00
<b>Limited Review:</b>															
2014 Beckley WV MSA	1	33.33	23.70	0.00	16.66	0.00	19.29	0.00	40.34	100.00	0.11	0.00	0.00	0.00	0.20
2014 Charleston WV MSA	1	33.33	20.10	0.00	18.02	0.00	20.89	100.00	40.98	0.00	0.06	0.00	0.28	0.00	0.00
2014 Hagerstown-Martinsburg WV MSA	0	0.00	19.55	0.00	19.15	0.00	22.63	0.00	38.67	0.00	0.00	0.00	0.00	0.00	0.00
2014 Logan County WV	0	0.00	22.44	0.00	15.86	0.00	22.46	0.00	39.25	0.00	0.00	0.00	0.00	0.00	0.00
2014 Nicholas and Webster Counties WV	0	0.00	23.63	0.00	16.30	0.00	21.43	0.00	38.65	0.00	0.00	0.00	0.00	0.00	0.00
2014 Northern Non-MSA WV	0	0.00	18.98	0.00	16.70	0.00	19.72	0.00	44.60	0.00	0.00	0.00	0.00	0.00	0.00

\* Based on 2014 Peer Mortgage Data – US and PR

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

\*\*\* Percentage of Families is based on the 2010 Census information.

\*\*\*\* As a percentage of loans with borrower income information available. No information was available for 0.0% of loans originated and purchased by bank.

44 Data shown includes only One to Four-family and manufactured housing. (Property type of 1 or 2)



**Table 9. Borrower Distribution of Home Improvement Loans**

Borrower Distribution: HOME IMPROVEMENT		Geography: WEST VIRGINIA					Evaluation Period: JANUARY 1, 2014 TO JUNE 30, 2015					Market Share*				
Assessment Area:	Total Home Improvement Loans		Low-Income Borrowers		Moderate-Income Borrowers		Middle-Income Borrowers		Upper-Income Borrowers							
	#	% of Total**	% Families***	% BANK Loans****	% Families <sup>45</sup>	% BANK Loans****	% Families***	% BANK Loans****	% Families***	% BANK Loans****	Overall	Low	Mod	Mid	Upp	
<b>Full Review:</b>																
2014 Huntington-Ashland WV MSA	3	42.86	21.36	0.00	17.32	33.33	18.83	0.00	42.49	66.67	0.30	0.00	1.59	0.00	0.00	
<b>Limited Review:</b>																
2014 Beckley WV MSA	1	14.29	23.70	0.00	16.66	0.00	19.29	100.00	40.34	0.00	0.00	0.00	0.00	0.00	0.00	
2014 Charleston WV MSA	1	14.29	20.10	100.00	18.02	0.00	20.89	0.00	40.98	0.00	0.26	1.54	0.00	0.00	0.00	
2014 Hagerstown-Martinsburg WV MSA	0	0.00	19.55	0.00	19.15	0.00	22.63	0.00	38.67	0.00	0.00	0.00	0.00	0.00	0.00	
2014 Logan County WV	0	0.00	22.44	0.00	15.86	0.00	22.46	0.00	39.25	0.00	0.00	0.00	0.00	0.00	0.00	
2014 Nicholas and Webster Counties WV	0	0.00	23.63	0.00	16.30	0.00	21.43	0.00	38.65	0.00	0.00	0.00	0.00	0.00	0.00	
2014 Northern Non-MSA WV	2	28.57	18.98	0.00	16.70	0.00	19.72	50.00	44.60	50.00	0.73	0.00	2.44	1.96	0.00	

\* Based on 2014 Peer Mortgage Data – US and PR

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

\*\*\* Percentage of Families is based on the 2010 Census information.

\*\*\*\* As a percentage of loans with borrower income information available. No information was available for 0.0% of loans originated and purchased by bank.

<sup>45</sup> Data shown includes only One to Four-family and manufactured housing. (Property type of 1 or 2)

**Table 10. Borrower Distribution of Home Mortgage Refinance Loans**

Borrower Distribution: HOME MORTGAGE REFINANCE			Geography: WEST VIRGINIA				Evaluation Period: JANUARY 1, 2014 TO JUNE 30, 2015					Market Share*				
Assessment Area:	Total Home Mortgage Refinance Loans		Low-Income Borrowers		Moderate-Income Borrowers		Middle-Income Borrowers		Upper-Income Borrowers		Market Share*					
	#	% of Total**	% Families***	% BANK Loans****	% Families <sup>46</sup>	% BANK Loans****	% Families***	% BANK Loans****	% Families***	% BANK Loans****	Overall	Low	Mod	Mid	Upp	
<b>Full Review:</b>																
2014 Huntington-Ashland WV MSA	38	21.71	21.36	2.63	17.32	36.84	18.83	23.68	42.49	36.84	2.12	0.00	7.05	1.82	1.22	
<b>Limited Review:</b>																
2014 Beckley WV MSA	30	17.14	23.70	0.00	16.66	26.67	19.29	20.00	40.34	53.33	3.23	0.00	7.37	3.28	2.45	
2014 Charleston WV MSA	35	20.00	20.10	14.29	18.02	22.86	20.89	22.86	40.98	40.00	2.10	5.26	2.55	2.45	1.26	
2014 Hagerstown-Martinsburg WV MSA	25	14.29	19.55	24.00	19.15	36.00	22.63	8.00	38.67	32.00	1.64	3.53	2.47	0.86	1.33	
2014 Logan County WV	4	2.29	22.44	0.00	15.86	0.00	22.46	0.00	39.25	100.00	3.28	0.00	0.00	0.00	5.19	
2014 Nicholas and Webster Counties WV	0	0.00	23.63	0.00	16.30	0.00	21.43	0.00	38.65	0.00	0.00	0.00	0.00	0.00	0.00	
2014 Northern Non-MSA WV	43	24.57	18.98	2.33	16.70	11.63	19.72	25.58	44.60	60.47	3.83	4.00	5.66	5.23	3.01	

\* Based on 2014 Peer Mortgage Data – US and PR

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

\*\*\* Percentage of Families is based on the 2010 Census information.

\*\*\*\* As a percentage of loans with borrower income information available. No information was available for 0.0% of loans originated and purchased by bank.

46 Data shown includes only One to Four-family and manufactured housing. (Property type of 1 or 2)

**Table 11. Borrower Distribution of Small Loans to Businesses**

Borrower Distribution: SMALL LOANS TO BUSINESSES		Geography: WEST VIRGINIA			Evaluation Period: JANUARY 1, 2014 TO JUNE 30, 2015				
Assessment Area:	Total Small Loans to Businesses		Businesses With Revenues of \$1 million or less		Loans by Original Amount Regardless of Business Size			Market Share*	
	#	% of Total**	% of Businesses***	% BANK Loans****	\$100,000 or less	>\$100,000 to \$250,000	>\$250,000 to \$1,000,000	All	Rev\$ 1 Million or Less
<b>Full Review:</b>									
2014 Huntington-Ashland WV MSA	3	17.65	66.84	100.00	100.00	0.00	0.00	0.11	0.26
<b>Limited Review:</b>									
2014 Beckley WV MSA	2	11.76	66.73	100.00	100.00	0.00	0.00	0.07	0.18
2014 Charleston WV MSA	3	17.65	65.84	100.00	100.00	0.00	0.00	0.11	0.30
2014 Hagerstown-Martinsburg WV MSA	1	5.88	72.71	100.00	100.00	0.00	0.00	0.00	0.00
2014 Logan County WV	4	23.53	65.91	100.00	100.00	0.00	0.00	1.24	3.70
2014 Nicholas and Webster Counties WV	0	0.00	64.78	0.00	0.00	0.00	0.00	0.00	0.00
2014 Northern Non-MSA WV	4	23.53	65.54	100.00	100.00	0.00	0.00	0.10	0.32

\* Based on 2014 Peer Small Business Data – US and PR

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

\*\*\* Businesses with revenues of \$1 million or less as a percentage of all businesses (Source D&B - 2014).

\*\*\*\* Small loans to businesses with revenues of \$1 million or less as a percentage of all loans reported as small loans to businesses. No information was available for 0.00% of small loans to businesses originated and purchased by the bank.

**Table 13. Geographic and Borrower Distribution of Consumer Loans**

Geographic and Borrower Distribution: CONSUMER LOANS																			Geography: WEST VIRGINIA				Evaluation Period: JANUARY 1, 2014 TO JUNE 30, 2015			
Assessment Area:	Geographic Distribution										Borrower Distribution															
	Total Consumer Loans		Low-Income Geographies		Moderate-Income Geographies		Middle-Income Geographies		Upper-Income Geographies		Low-Income Borrowers		Moderate-Income Borrowers		Middle-Income Borrowers		Upper-Income Borrowers									
	#	% of Total*	% of Hhlds**	% of BANK Loans	% of Hhlds**	% of BANK Loans	% of Hhlds**	% of BANK Loans	% of Hhlds**	% of BANK Loans	% of Hhlds**	% of BANK Loans	% of Hhlds**	% of BANK Loans	% of Hhlds**	% of BANK Loans	% of Hhlds**	% of BANK Loans								
<b>Full Review:</b>																										
2014 Huntington-Ashland WV MSA	47	16.26	5.22	2.13	20.98	12.77	40.20	53.19	33.60	31.91	24.54	61.70	15.95	27.66	15.84	2.13	43.66	8.51								
<b>Limited Review:</b>																										
2014 Beckley WV MSA	47	16.26	0.00	0.00	10.72	17.02	71.31	78.72	17.97	4.26	24.83	51.06	16.42	14.89	15.32	23.40	43.42	10.64								
2014 Charleston WV MSA	50	17.30	0.00	0.00	20.35	24.00	58.86	60.00	20.78	16.00	24.34	60.00	15.82	22.00	18.46	10.00	41.38	8.00								
2014 Hagerstown-Martinsburg WV MSA	30	10.38	0.00	0.00	20.30	30.00	71.36	60.00	8.34	10.00	21.99	66.67	17.96	16.67	18.43	3.33	41.62	13.33								
2014 Logan County WV	38	13.15	0.00	0.00	0.00	0.00	100.00	100.00	0.00	0.00	23.78	63.16	15.52	26.32	18.05	2.63	42.66	7.89								
2014 Nicholas and Webster Counties WV	32	11.07	0.00	0.00	12.12	6.25	87.88	93.75	0.00	0.00	24.58	46.88	16.87	28.13	14.67	15.63	43.87	9.38								
2014 Northern Non-MSA WV	45	15.57	0.74	2.22	6.96	4.44	61.16	64.44	31.15	28.89	22.69	51.11	15.49	20.00	15.71	13.33	46.11	15.56								

\* Consumer Loans originated and purchased in the MA/AA as a percentage of all consumer loans originated and purchased in the rated area.  
 \*\* Percentage of households is based on 2010 Census Information.

**Table 14. Qualified Investments**

QUALIFIED INVESTMENTS		Geography: WEST VIRGINIA				Evaluation Period: JUNE 24, 2012 TO JULY 13, 2015			
Assessment Area:	Prior Period Investments*		Current Period Investments		Total Investments			Unfunded Commitments**	
	#	\$(000's)	#	\$(000's)	#	\$(000's)	% of Total	#	\$(000's)
<b>Full Review:</b>									
2014 Huntington-Ashland WV MSA	0	0	1	135	1	135	19.54	0	0
<b>Limited Review:</b>									
2014 Beckley WV MSA	0	0	1	58	1	58	8.39	0	0
2014 Charleston WV MSA	0	0	3	15	3	15	2.17	0	0
2014 Hagerstown-Martinsburg WV MSA	0	0	2	323	2	323	46.74	0	0
2014 Logan County WV	0	0	3	18	3	18	2.61	0	0
2014 Nicholas and Webster Counties WV	0	0	0	0	0	0	0.00	0	0
2014 Northern Non-MSA WV	0	0	2	142	2	142	20.55	0	0

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

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

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

DISTRIBUTION OF BRANCH DELIVERY SYSTEM AND BRANCH OPENINGS/CLOSINGS Geography: WEST VIRGINIA Evaluation Period: JANUARY 1, 2014 TO JUNE 30, 2015																	
MA/Assessment Area:	Deposits	Branches						Branch Openings/Closings				Population					
	% of Rated Area Deposits in AA	# of BANK Branches	% of Rated Area Branches in AA	Location of Branches by Income of Geographies (%)				# of Branch Openings	# of Branch Closings	Net change in Location of Branches (+ or -)				% of Population within Each Geography			
				Low	Mod	Mid	Upp			Low	Mod	Mid	Upp	Low	Mod	Mid	Upp
<b>Full Review:</b>																	
2014 Huntington-Ashland WV MSA	9.61	1	11.11	0.00	0.00	0.00	100.00	0	0	0	0	0	0	5.98	19.35	41.18	33.50
<b>Limited Review:</b>																	
2014 Beckley WV MSA	19.04	2	22.23	0.00	0.00	100.00	0.00	0	0	0	0	0	0	0.00	10.40	73.06	16.54
2014 Charleston WV MSA	9.88	1	11.11	0.00	0.00	100.00	0.00	0	0	0	0	0	0	0.00	19.29	60.66	20.05
2014 Hagerstown-Martinsburg WV MSA	6.91	1	11.11	0.00	100.00	0.00	0.00	0	0	0	0	0	0	0.00	16.74	73.78	9.48
2014 Logan County WV	18.23	1	11.11	0.00	0.00	100.00	0.00	0	0	0	0	0	0	0.00	0.00	100.00	0.00
2014 Nicholas and Webster Counties WV	13.85	1	11.11	0.00	0.00	100.00	0.00	0	0	0	0	0	0	0.00	10.60	89.40	0.00
2014 Northern Non-MSA WV	22.48	2	22.22	0.00	0.00	0.00	100.00	0	0	0	0	0	0	0.70	7.38	61.08	30.85

