



LARGE BANK

Comptroller of the Currency
Administrator of National Banks

Washington, DC 20219

Public Disclosure

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Community Reinvestment Act **Performance Evaluation**

Peoples Bank, National Association
Charter Number: 5552

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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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Overall CRA Rating

Institution's CRA Rating: This institution is rated Outstanding.

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

Performance Levels	Peoples Bank, NA Performance Tests		
	Lending Test*	Investment Test	Service Test
Outstanding	X	X	X
High Satisfactory			
Low Satisfactory			
Needs to Improve			
Substantial Noncompliance			

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

The major factors that support this rating include:

- Lending levels reflect good responsiveness to assessment area (AAs) credit needs.
- Geographic distribution of loans by income level of geography is excellent.
- Distribution of loans by income level of the borrower is excellent.
- Given the available opportunities within the bank's AAs, the level of qualified investments is excellent.
- Delivery systems are readily accessible to all geographies and individuals of different income levels throughout its AAs.

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.

Block Numbering Area (BNA): A statistical subdivision of a county for grouping and numbering blocks in non-metropolitan counties where local census statistical area committees have not established census tracts. A BNA does not cross county lines.

Census Tract (CT): A small subdivision of metropolitan and other densely populated counties. Census tract boundaries do not cross county lines; however, they may cross the boundaries of metropolitan areas. Census tracts usually have between 2,500 and 8,000 persons, and their physical size varies widely depending upon population density. Census tracts are designed to be homogeneous with respect to population characteristics, economic status, and living conditions to allow for statistical comparisons.

Community Development: Affordable housing (including multifamily rental housing) for low- or moderate-income individuals; community services targeted to low- or moderate-income individuals; activities that promote economic development by financing businesses or farms that meet the size eligibility standards of the Small Business Administration's Development Company or Small Business Investment Company programs (13 CFR 121.301) or have gross annual revenues of \$1 million or less; or, activities that revitalize or stabilize low- or moderate-income geographies.

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 household and no wife present) or 'female householder' (a family with a female householder and no husband present).

Full 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 or a block numbering area 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 area to file annual summary reports of their mortgage lending activity. The reports include such data as the race, gender, and the income of applications, the amount of loan requested, and the disposition of the application (e.g., approved, denied, and withdrawn).

Home Mortgage Loans: such loans include home purchase and home improvement loans, as defined in the HMDA regulation. This definition also includes loans for multifamily (five or more families) dwellings, loans for the purchase of manufactured homes and refinancing of home improvement and home purchase loans.

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

Limited 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 a geography.

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

Median Family Income (MFI): The median income determined by the U.S. Census Bureau every ten years and used to determine the income level category of geographies. Also, the median income determined by the Department of Housing and Urban Development annually that is used to determine the income level category of

individuals. For any given area, the median is the point at which half of the families have income above it and half below it.

Metropolitan Area (MA): Any primary metropolitan area (PMA), metropolitan area (MA), or consolidated metropolitan area (CMA), as defined by the Office of Management and Budget, with a population of 250,000 or more, and any other area designated as such by the appropriate federal financial supervisory agency.

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

Moderate-Income: Individual income that is at least 50 percent and less than 80 percent of the area median income, or a median family income that is at least 50 percent and less than 80 percent, in the case of a geography.

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

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

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

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

Rated Area: A rated area is a state or multi-state 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 multi-state metropolitan area, the institution will receive a rating for the multi-state metropolitan area.

Small Loan(s) to Business(es): A loan included in 'loans to small businesses' as defined in the Consolidated Report of Condition and Income (Call Report) and the Thrift Financial Reporting (TFR) instructions. These loans have original amounts of \$1 million or less and typically are either secured by nonfarm or nonresidential real estate or are classified as commercial and industrial loans. However, thrift institutions may also exercise the option to report loans secured by nonfarm residential real estate as "small business loans" if the loans are reported on the TFR as nonmortgage, commercial loans.

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

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 more than 120 percent of the area median income, or a median family income that is more than 120 percent, in the case of a geography.

Description of Institution

Peoples Bank, N.A. (PBNA) is a wholly owned subsidiary of Peoples Bancorp, Inc., a publicly traded company (NASDAQ: PEBO) headquartered in Marietta, Ohio. As of June 30, 2006 PEBO had \$1.9 billion in total assets.

PBNA is an interstate bank, with 46 branches, 3 insurance offices, 3 loan production offices (LPOs), and 34 ATMs throughout Ohio, West Virginia, and Kentucky. PBNA acquired Kentucky Bancshares in 2003 and Advantage bank in 2004. PBNA has six AAs for CRA purposes. All of PBNA's AA's meet the requirements of the regulation and do not arbitrarily exclude any low- or moderate-income areas. The bank operates in two multi-state MAs; the Parkersburg-Marietta MSMA in West Virginia and Ohio and the Huntington-Ashland MSMA in West Virginia and Kentucky. It also operates in the Columbus, Ohio MA, Fairfield County; and three non-MA geographies in Ohio, Kentucky, and West Virginia.

PBNA maintains a market area that encompasses 18 counties in southeastern Ohio and neighboring areas of Kentucky and West Virginia. The bank's operations focus mainly on non-major urban areas. Its primary market areas possess diverse economic bases that have no single or dominant industry or employer. Principal industries within the bank's market areas include: health care, education, and other social services; plastics and petrochemical manufacturing; oil, gas, and coal production; tourism and other service related industries. PBNA does not appear to be dependent on any single industry segment for its business opportunities, and management believes the bank's diverse economic bases insulate the market areas from some of the fluctuations of national economic cycles.

PBNA offers a full range of banking products and services. As of June 30, 2006, PBNA had \$1.9 billion in assets. Loans represented 59 percent of total assets. The distribution of PBNA's loan portfolio was as follows: Construction and Development loans (7.60 percent); commercial & commercial real estate loans (54.94 percent); loans to individuals (5.74 percent); 1-4 family residential loans (31.15 percent) and the remaining .57 percent is comprised of multiple other loan categories. PBNA's Tier One Capital was \$141 million (as of 6/30/06).

In determining the size and capacity of PBNA for CRA evaluation purposes, we considered operating subsidiaries and affiliates of the bank. None of the bank operating subsidiaries or affiliates contributes to or detracts from the CRA performance of the bank. Peoples Bancorp Inc. formed Peoples Bancorp Foundation, Inc., an independent non-profit corporation, to make charitable distributions to organizations located in Peoples Bank's market areas in Ohio, West Virginia and Kentucky. The Foundation was established in 2004. Affiliate activity was not considered in the evaluation of PBNA's CRA performance.

Peoples Bank, N.A. was rated "Satisfactory" at its last large bank CRA evaluation, dated June 3, 2002. There are no legal, financial or other factors that impede the bank's ability to help meet the credit needs in its AAs.

Scope of the Evaluation

Evaluation Period/Products Evaluated

This performance evaluation assesses the bank's performance under the Lending, Investment, and Service Tests. In evaluating the bank's lending performance, we reviewed its home mortgage loans and small loans to businesses. We did not evaluate small loans to farms since this is not a significant lending activity of PBNA. With the exception of community development (CD) loans, the evaluation period for the Lending Test is January 1, 2003 through December 31, 2005. This evaluation period reflects all data on home mortgage loans and small loans to businesses submitted from January 2003 through December 31, 2005 by the institution. The evaluation period for Community Development Loans, Investments and Services is from the date of the last evaluation, June 2, 2002 to October 23, 2006.

A narrative description of the bank's performance during 2003 is compared to the bank's performance in 2004 and 2005. The 2003 data was evaluated separately from 2004 and 2005 due to the use of 2000 census data and geographic boundaries for metropolitan statistical areas (MA) in place prior to changes that became effective in 2004. The 2004 and 2005 data was evaluated using 2000 census data and the new boundaries for MA's that became effective in 2004.

Data Integrity

The Community Reinvestment Act requires that banks collect and maintain certain data regarding originations and purchases of home mortgage loans, small loans to businesses, and small loans to farms. This information is maintained in the bank's public file. As part of the CRA evaluation, we tested the bank's publicly filed data on home mortgage loans and small loans to businesses for accuracy. We also evaluated PBNA's processes to ensure that the data are reliable.

We determined the bank's 2002 through 2005 data on home mortgage loans and small loans to businesses is reasonably accurate. We conducted a review to evaluate the bank's submitted data by comparing actual loan files to reported data. The data was found to be reliable. Therefore, this evaluation is based on accurate data. Though 2002 data is deemed reliable, a technical problem with analyzing the data from 2002 prevented using the data in this evaluation.

CD loans, qualified investments, and CD services submitted by PBNA management were verified to ensure that they met the regulatory definition for community development. Some items submitted for consideration were excluded from this evaluation because they did not meet the definition or purpose of community development. Therefore, this evaluation was based on CD loans, qualified investments, and CD services that met the regulatory definitions.

Selection of Areas for Full-Scope Review

In each state where the bank has an office, a sample of AAs within that state was selected for full-scope reviews. Refer to the scope of evaluation under each State Rating section for details regarding how the areas were selected. Every multi-state MA in which the bank has branches in more than one state received a full-scope review.

Ratings

The bank's overall rating is a blend of the multi-state MA ratings and state ratings. Weighting of the rating areas was determined by examining the percentage of bank deposits and deposit market share, percentage of bank loans, and distribution of bank offices among the AAs.

The multi-state Parkersburg-Marietta MA rating area received the most weight since 44 percent of PBNA's deposits, 36 percent of the bank's loans, and 28 percent of the bank's offices are located in this rated area. A significant portion of the overall rating was also based on the bank's performance in the state of Ohio. Bank deposits, loans, and branches in these areas were 27 percent, 39 percent, and 39 percent, respectively. The state of West Virginia and the Huntington/Ashland MSMA received moderate weight reflective of its deposits 13 percent each and lending (6 percent and 12 percent respectively) presence in these areas. The State of Kentucky and the Columbus MA received the least weight since only 1 percent and 2 percent respectively of PBNA's deposits and 1 percent and 6 percent respectively of the bank's loans are located in these areas.

The multi-state MA ratings and state ratings are based primarily on those areas that received full-scope reviews. Refer to the scope of evaluation under each State Rating section for details regarding how the areas were weighted in arriving at the overall state rating.

Fair Lending Review

We found no evidence of discriminatory or other illegal credit practices inconsistent with helping to meet community credit needs.

Multistate Metropolitan Area Rating

Parkersburg-Marietta MA

CRA rating for the Parkersburg-Marietta MA ¹: Outstanding

The lending test is rated: Outstanding

The investment test is rated: Outstanding

The service test is rated: Outstanding

The major factors that support this rating include:

- Overall lending levels reflect an excellent responsiveness to meeting the credit needs of the AA.
- The geographic distribution of loans is good. The geographic distribution of home mortgage loans is good. The geographic distribution of small loans to businesses is excellent.
- The distribution of loans by income level of the borrower is excellent. The distribution of home mortgage loans by borrower income level is excellent. The distribution of small loans to businesses with annual revenues of \$1 million or less is also excellent.
- Community development lending had a positive impact on the lending test conclusions.
- Given the available opportunities within the AA, the level of qualified investments is excellent.
- Delivery systems are readily accessible to all geographies and individuals of different income levels throughout the AA.

¹ 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.

Description of Institution's Operations in Parkersburg-Marietta MA

Refer to the market profile for the Parkersburg-Marietta MA in Appendix C for detailed demographics and other performance context information.

LENDING TEST

The bank's performance under the lending test in the Parkersburg-Marietta MA is rated Outstanding. Based on a full scope review, the bank's lending performance in the AA is excellent.

We placed more emphasis on home mortgage loans when evaluating product performance based on identified credit needs and the fact that PBNA originated more home mortgage loans than small loans to businesses. Based on volume, we placed more weight on home purchase loans (453) and home improvement loans (128) received the least weight. Because the number of the bank's multifamily loans is not significant enough to perform a meaningful analysis, we did not consider multifamily loans in evaluating the bank's geographic distribution of loans this AA.

Lending Activity

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

Overall lending levels reflect excellent responsiveness to meeting the credit needs of the AA. Relative to its deposit market rank, PBNA's home mortgage lending levels are excellent and its small business lending levels are good. Within the Parkersburg-Marietta MA, the bank ranks second in deposits (20 percent market share), second in home mortgages (8 percent market share) and tenth in small loans to businesses (4 percent market share). By home mortgage product, PBNA ranks third for each of home purchases (8 percent market share), home improvement (11 percent market share) and home refinance (7 percent market share) loans.

Distribution of Loans by Income Level of the Geography

The overall geographic distribution of loans in the AA is good. The geographic distribution of home mortgage loans is good. The geographic distribution of small loans to businesses is excellent.

We considered the following factors in assessing the bank's lending performance in low- and moderate-income geographies. There are no low-income geographies within the AA. For home mortgage loans, our review focused on the bank's lending performance relative to the level of owner-occupied units in moderate-income geographies. The AA has 9.25 percent of its owner-occupied housing units located in moderate-income geographies. For small loans to businesses, our review focused on the bank's lending performance relative to the percentage of businesses located within moderate-income

geographies. The AA has 30.25 percent of its businesses located in moderate-income geographies.

Home Mortgage Loans

Refer to Tables 2, 3, 4, and 5 in Appendix D for the facts and data used to evaluate the geographic distribution of the bank's home mortgage loan originations and purchases.

Home Purchase Loans

The geographic distribution of the bank's home purchase loans is excellent. PBNA's percentage of home purchase loans in moderate-income geographies exceeds the percentage of owner-occupied housing units in moderate-income geographies. The bank's market share for home purchase loans in moderate-income geographies also exceeds its overall market share.

Home Improvement Loans

The geographic distribution of the bank's home improvement loans is good. PBNA's percentage of home improvement loans in moderate-income geographies is near the percentage of owner-occupied units in moderate-income geographies. The bank's market share for home improvement loans is also near to its overall market share.

Home Refinance Loans

The geographic distribution of the bank's home refinance loans is adequate. PBNA's percentage of home refinance loans in moderate-income geographies is somewhat below the percentage of owner-occupied housing units in moderate-income geographies. The bank's market share for home refinance loans in moderate-income geographies is also somewhat below its overall market share.

Small Loans to Businesses

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

The geographic distribution of the bank's small loans to businesses is excellent. PBNA's percentage of small loans to businesses substantially meets the percentage of businesses located in moderate-income geographies. The bank's market share for small loans to businesses in moderate-income geographies meets its overall market share.

Lending Gap Analysis

PBNA's lending within this AA was evaluated to determine if any unexplained or conspicuous gaps were identified regarding the geographic distribution of the bank's

home mortgage loans and small loans to businesses. No unexplained or conspicuous gaps were identified.

Inside/Outside Ratio

We performed the inside/outside ratio lending analysis at the bank level. We based this determination on the contiguous nature of the bank's AAs, including two multistate MAs.

A substantial majority of bank's loan originations are within its AAs. Overall, 86 percent of PBNA's loan originations are within its AA. By loan product, 90 percent of home mortgage loans and 74 percent of small loans to businesses are inside the AA. Within the home mortgage loans, PBNA's originations of home purchase, home improvement and home refinance loans inside the bank's AA are 88 percent, 91 percent and 91 percent respectively. This performance was positively factored into the overall analysis of the bank's lending performance.

Distribution of Loans by Income Level of the Borrower

The overall distribution of loans by income level of borrower in the AA is excellent. The distribution of home mortgage loans by borrower income level is excellent. The distribution of small loans to businesses with annual revenues of \$1 million or less is also excellent.

We considered the following factors in assessing the bank's lending performance to low- and moderate-income borrowers. For home mortgage loans, our review focused on the bank's lending performance relative to the level of low- and moderate-income families within the AA. Eighteen (18.46) percent of the AA is listed as low-income and nineteen (19.07) percent are listed as moderate-income. Additionally, 13 percent of the households in the AA are below the poverty level. Information obtained from local realtors and community organizations regarding the median and average sales price for single-family residences in the AA was used to determine the affordability of home mortgage loans for low-income borrowers. Based on this information, it was determined that home mortgage loan opportunities for low-income families in the AA are limited. This issue was factored into the analysis of home purchase and home refinance loans.

For small loans to businesses, our review focused on the bank's lending performance relative to the percentage of businesses with annual revenues of \$1 million or less. Sixty percent (60.40 percent) of the businesses located in the AA have reported gross annual revenues of \$1 million or less. Information obtained from community contacts also indicated that business loans in amounts of \$25,000 or less was a credit need of the AA. As such, loan size was also considered in the analysis.

Home Mortgage Loans

Refer to Tables 8, 9, and 10 in Appendix D for the facts and data used to evaluate the borrower distribution of the bank's home mortgage loan originations and purchases.

Home Purchase Loans

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

PBNA's percentage of home purchase loans made to low-income borrowers is somewhat below the percentage of low-income families in the AA. Performance context issues outlined above mitigate this data. PBNA is a market leader and ranks third among 49 lenders for home purchase loans to low-income borrowers in the AA.

PBNA's percentage of home purchase loans to moderate-income borrowers greatly exceeds the percentage of moderate-income families in the AA. The bank's market share for home purchase loans to moderate-income borrowers exceeds its overall market share.

Home Improvement Loans

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

PBNA's percentage of home improvement loans made to low-income borrowers significantly exceeds the percentage of low-income families in the AA. The bank's market share for home improvement loans to low-income borrowers significantly exceeds its overall market share.

PBNA's percentage of home improvement loans made to moderate-income borrowers significantly exceeds the percentage of moderate-income families in the AA. The bank's market share for home improvement loans to moderate-income borrowers exceeds its overall market share.

Home Refinance Loans

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

PBNA's percentage of home refinance loans made to low-income borrowers is below the percentage of low-income families in the AA. Performance context issues outlined above mitigate this data. The bank's market share for home refinance loans to low-income borrowers meets its overall market share. PBNA is a market leader for home refinance loans and ranks second out of 67 lenders to low-income borrowers.

PBNA's percentage of home refinance loans to moderate-income borrowers significantly exceeds the percentage of moderate-income families in the AA. The bank's market share for home refinance loans to moderate-income borrowers exceeds its overall market share.

Small Loans to Businesses

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

The borrower distribution of the bank's small loans to businesses is excellent. PBNA's percentage of small loans to businesses with revenues of \$1 million or less exceeds the percentage of businesses defined as such. The bank's market share of small loans to businesses with revenues of \$1 million or less also exceeds its overall market share. Additionally, a significant percentage of PBNA's small loans to businesses are for amounts of \$100,000 or less, which reflects the credit needs of the AA.

Community Development Lending

Refer to Table 1 Lending Volume in 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. In addition, Table 5 includes geographic lending data on all multifamily loans, including those that also qualify as CD loans. Table 5 does not separately list CD loans.

PBNA's level of CD lending is good, based on the available opportunities within the bank's AA. Based on a pro-rata share of the bank's deposits for the AA, the level of CD lending represents approximately 16 percent of Tier One Capital. These loans had a positive impact on the lending performance in the AA.

Within the city of Marietta, PBNA made two loans totaling \$10 million to local manufacturing companies for plant and operations expansions. In both instances, the loans enabled these companies to expand their businesses and created additional low- and moderate-income positions for AA individuals.

Product Innovation and Flexibility

Affordable mortgage products aimed at LMI households was identified as a credit need of the community. PBNA offers seven flexible home mortgage products, as detailed below. These programs are designed to assist low- and moderate-income borrowers obtain financing. Loans originated under these products were evaluated as home mortgage loans under the Lending Test. While all programs provide flexible terms and conditions, the Disaster Loan program by PBNA is considered innovative as it was implemented in response to several floods which occurred during the evaluation period. The bank's flexible home mortgage products had a positive impact on the lending performance of the AA.

- The bank's Residential Assistance Program (RAP) includes flexible criteria, including 5 percent down payment, no minimum loan amounts, no points, no private mortgage insurance requirement, and higher qualifying debt ratios. Eligibility for the program is based on HUD's annual family income schedule. During the evaluation period, the bank originated 27 RAP loans within the AA totaling \$1.5 million.
- The bank's Disaster Loan Program (DLP) is targeted to customers that have suffered a loss due to a disaster. The DLP is an unsecured loan which is offered

at a lower rate, with a maximum loan amount of \$5 thousand for homeowners and \$2,500 for renters. The maximum term for the loan is 5 years for homeowners and 3 years for renters, depending upon amount received. During the evaluation period, the bank originated 5 Disaster loans within the AA totaling \$21 thousand.

- The bank's My Community Mortgage (MCM) program includes flexible criteria, including no minimum borrower contribution, temporary interest rate buy-down eligibility, longer terms and interest-only periods, reserve flexibility, standard Fannie Mae guidelines pertaining to flexible sources of funds for closing costs and remaining down payment, nontraditional credit evaluations, as well as nontraditional income sources. During the evaluation period, the bank originated 31 MCM loans within the AA totaling \$1.8 million.
- The Community Housing Improvement Program (CHIP) Down Payment Program promotes home ownership opportunities through outreach and education activities that primarily serve low and moderate income individuals and families. The CHIP program includes the following criteria: no origination fee, low down payment, waiver of the PMI requirement, and assistance with down payment and closing cost up to \$15 thousand. During the evaluation period, the bank originated 1 CHIP loan within the AA totaling \$71 thousand.
- The Welcome Home Grant Program (WHGP) is targeted to households whose incomes are at or below 80 percent of Mortgage Revenue Bond (MRB) income limits, as adopted by the appropriate state housing finance agency, adjusted for family size. The WHGP program requires the homebuyer to contribute at least \$500 of their own funds toward down payment and closing costs, however, 60% of these funds may be received as a gift. The bank must provide some form of measurable contribution (i.e. waivers, reduced points, below market interest rates, etc) towards the household's mortgage financing. Borrowers are required to complete a homebuyers-counseling program and remain in the home for a period of five years without refinancing or selling the dwelling. Welcome home grant will be reduced if origination fee is greater than one percent, or if discount points charged are greater than one-half on one percent. During the review period, the bank originated 57 WHGP loans within the AA totaling \$321 thousand.
- The Ohio Housing Loan (OHL) is targeted to households that fall within the Ohio Housing Finance Agency maximum family income parameters. The OHL loan is a 30 year fixed rate loan with the option of a 100 percent LTV. The down payment assistance program provides a 2 percent grant that can be applied towards closing costs with no repayment of funds required. For a second mortgage a 4 percent grant with a minimal 20 year term is also available at a rate that is 2 percent above the unassisted first mortgage rate. During the review period, the bank originated 5 OHL loans within the AA totaling \$233 thousand.
- The Huntington WV Housing Authority's (HHA) loan is targeted to borrowers who fall within 30 to 50 percent of the area median income as determined by the WV

income limits schedule, and is currently receiving Section 8 rental assistance vouchers. The requirements are as follows: a down payment of 1 to 3 percent, if the borrower is not able to obtain the down payment, PBNA will provide assistance of up to \$1204.55 per low-income participant. During the review period, the bank originated 16 HHA loans within the AA totaling \$1.1 million.

Conclusions for PBNA's 2003 Lending Performance

We reviewed PBNA's lending performance for 2003 by analyzing the bank's submitted data separately from 2004 and 2005 data, as explained in The Scope of the Evaluation section of this report. We found that PBNA's performance is not inconsistent with the bank's performance during 2004 and 2005.

INVESTMENT TEST

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

PBNA's performance in the Parkersburg-Marietta MA is rated Outstanding under the investment test. Based on the full-scope review, the bank's performance is excellent.

Investments are primarily centered in donations, affordable housing projects, economic development, as well as prior period investments in affordable housing and community and social service needs. The bank committed to invest significant dollars into statewide low-income housing tax credit (LIHTC) projects. When drawing conclusions we considered the bank's level of capacity, dollar amount of investments, community development opportunities, and identified credit needs. We identified a moderate level of investment opportunities. Refer to the Market Profile for the Parkersburg-Marietta MA in Appendix C for needs and opportunities.

The opportunity to invest was primarily in charitable donations and grants. We did not identify any local low-income housing projects, or school or economic development bonds for low- and moderate-income individuals or agencies that serve low- and moderate-income individuals. Portions of the LIHTC projects fund affordable housing within the Non-MA areas of Ohio included in the bank's AA. Given the proximity of the AAs and the regional benefit of these projects, we allocated the bank's investment in the Ohio Capital Corporation based on its pro-rata share of PBNA deposits within Ohio. The bank's investments are not considered innovative or complex.

During the review period, the bank made 122 investments totaling \$ 2.8 million.

Investment activities included:

- Ohio Equity Fund Project IX – Allocated funds for this project in the AA is \$1.3 million. This Fund contains 28 properties with 1,918 affordable housing units. The allocated unfunded commitment for this AA is \$ 448 thousand.

- Ohio Equity Fund Project XI – Allocated funds for this project in the AA is \$1.1 million. This Fund contains 20 properties with 939 affordable housing units. The allocated unfunded commitment for this AA is \$ 638 thousand.
- Ohio Finance Fund – Allocated funds for the AA is \$232 thousand. This fund uses investments from the New Markets Tax Credit allocation to make loans to qualifying applicants in low-income geographies and businesses in the state of Ohio. Business purposes include start-up monies and funds to expand early stage and mature businesses.
- Appalachian Ohio Development Fund LP – An Ohio fund which invests in small businesses throughout an eleven-county region in southeastern Ohio. The allocated portion of the bank’s investment in this AA is \$145 thousand.
- Donations - The bank made 118 donations totaling \$104 thousand to local community organizations that provide community and social services to low- and moderate-income persons as well as community economic development projects.

Prior period investments include the following: In 1996, the bank invested \$ 2.1 million into Marietta Mills, a limited partnership doing business as Marietta Mills Apartment. Fifty-six apartments were created through a LIHTC project. These units continue to have a positive impact on the community due to its newer construction and the limited building of affordable housing units, including apartments, in the AA. Current book value of the project is \$ 1.4 million.

In addition, the bank invested \$100 thousand into the West Virginia Neighbor Investment Tax Credit Program in December 2001. The recipient of the funds was Community Resources, a nonprofit community action agency located in Parkersburg, West Virginia that provides community and social services to low- and moderate-income individuals and families. The tax credit applicable during this evaluation period is \$18,750.

SERVICE TEST

The bank’s performance under the service test in the Parkersburg-Marietta MA is rated Outstanding. Based on the full-scope review, the bank’s performance in this AA is excellent. We placed the most weight on the distribution of the bank’s branch delivery system in determining overall Service Test performance.

Retail Banking Services

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

In the Parkersburg-Marietta MA, PBNA's delivery systems are readily accessible to all portions of the assessment area. The bank operates 13 full-service branches in the AA. The percentage of the bank’s branches located in moderate-income geographies

exceeds the percentage of the population residing in those geographies. The percentage of the bank's branches in the middle-income geographies closely approximates the percentage of the population residing in those geographies. The AA has no low-income geographies. In addition, the bank has ten automated teller machines (ATMs). Of these, four (40 percent) are located in moderate-income geographies, and six (60 percent) are located in middle-income geographies. Services and availability do not vary in a way that inconveniences any portion of the AA. During the evaluation period, PBNA did not open or close any branches in the Parkersburg–Marietta MA.

Community Development Services

PBNA provides an excellent level of CD services. The primary CD services in the AA include conducting training sessions and providing financial expertise to a variety of community service and development organizations. There were several bank employees involved in organizations as Board members. Through their Board membership, bank employees were able to provide the organization's with their financial expertise. Some of the financial expertise provided included budget planning, project development, partnership management and marketing amongst others. Twenty-four bank employees were instructors at organizations for low- and moderate- income individuals. PBNA also organized a fund drive for relief efforts to a disaster area. Examples of CD services provided during the evaluation period in this AA are summarized below.

- Several PBNA employees instructed sessions on homebuyer education, banking education, and savings workshops. Training sessions included “Money Management”, “Debt Counseling”, “Checkbook Balancing”, “Basics of Checking Accounts”, “Basics in Banking Education”, “Math and Banking Financial Counseling Program”, and “Banking Information”. The training sessions were held at various organizations within the AA that target low- and moderate- income individuals. One bank employee provides financial training at a learning center for low- and moderate- income individuals who are working towards their GED.
- A bank officer serves as a member of a scholarship fund committee that awards scholarships to college students if the family's income is below the poverty guidelines. The scholarships are limited to low- and moderate-income students. The bank officer assists in qualifying applicants based on their income level.
- Three PBNA officers participated in the planning and coordination of a project which helps individuals with mental disabilities. The project helps those low- and moderate- income individuals by providing them with information on their housing needs. The information includes details on programs and funds available for affordable housing specifically for people low- and moderate-income individuals with disabilities.

Multistate Metropolitan Area Rating

Huntington-Ashland MA

CRA rating for the Huntington-Ashland MA ²: Outstanding

The lending test is rated: High Satisfactory

The investment test is rated: Outstanding

The service test is rated: Outstanding

The major factors that support this rating include:

- Overall lending levels reflect a good responsiveness to meeting the credit needs of the assessment area.
- The geographic distribution of home mortgage loans and small loans to businesses is good.
- The distribution of home mortgage loans by income level of the borrower is excellent. The distribution of small loans to businesses with annual revenues of \$1 million or less is good.
- Given the available opportunities within the bank's assessment area, the level of qualified investments is excellent.
- Delivery systems are readily accessible to all geographies and individuals of different income levels throughout its AA.

² 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.

Description of Institution's Operations in Huntington-Ashland MA

Refer to the market profile for the Huntington-Ashland MA in Appendix C for detailed demographics and other performance context information.

LENDING TEST

The bank's performance under the lending test in the Huntington-Ashland MA is rated High Satisfactory. Based on a full scope review, the bank's lending performance in the AA is excellent.

In evaluating the bank's lending test performance in this AA, we focused on home mortgage loans (245) based on volume compared to the volume of small business loans (178). We placed equal weight on home purchase loans (109) and on home refinance (104) and less weight on home improvement loans (28). Because the number of the bank's multifamily loans is not significant enough to perform a meaningful analysis, we did not consider those loans in evaluating the bank's geographic and borrower distribution of loans in this AA.

Lending Activity

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

Overall lending levels reflect a good responsiveness to meeting the credit needs of the AA. Relative to its deposit market rank, PBNA's home mortgage lending levels are good and its small business lending levels are adequate. Within the Huntington-Ashland MA, the bank ranks tenth in deposits (4 percent market share), 21st in home mortgages (1 percent market share) and fifteenth in small loans to businesses (less than 1 percent market share). By home mortgage product, PBNA ranks 32 (1 percent market share) for home purchase, twelfth (2 percent market share) for home improvement, and twenty-second (1 percent market share) for home refinance loans.

Distribution of Loans by Income Level of the Geography

The overall geographic distribution of home mortgage loans and small loans to businesses in the AA is good.

We considered the following factors in assessing the bank's lending performance in low- and moderate-income geographies. For home mortgage loans, our review focused on the bank's lending performance relative to the level of owner-occupied units in low- and moderate-income geographies. The AA has 10.72 percent of its owner-occupied housing units located in moderate-income geographies and less than 1 percent in the low-income geographies. Opportunities in the low-income geographies are so few that an analysis is not meaningful.

Home Mortgage Loans

Refer to Tables 2, 3, 4, and 5 in Appendix D for the facts and data used to evaluate the geographic distribution of the bank's home mortgage loan originations and purchases.

Home Purchase Loans

The geographic distribution of the bank's home purchase loans is excellent. PBNA's percentage of home purchase loans made in moderate-income geographies exceeds the percentage of owner-occupied housing units in moderate-income geographies. The bank's market share for home purchase loans in moderate-income geographies meets its overall market share.

Home Improvement Loans

The geographic distribution of the bank's home improvement loans is excellent. PBNA's percentage of home improvement loans made in moderate-income geographies meets the percentage of owner occupied units in moderate-income geographies. The bank's market share for home improvement loans in the moderate-income geographies exceeds its overall market share.

Home Refinance Loans

The geographic distribution of the bank's home refinance loans is adequate. PBNA's percentage of home refinance loans made in moderate-income geographies is below the percentage of owner-occupied housing units in moderate-income geographies. The bank's market share for home refinance loans in moderate-income geographies exceeds its overall market share.

Small Loans to Businesses

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

The geographic distribution of the bank's small loans to businesses is good.

PBNA's percentage of small loans to businesses is below the percentage of businesses located in low-income geographies. The bank's market share for small loans to businesses in the low-income geographies is below its overall market share.

PBNA's percentage of small loans to businesses exceeds the percentage of businesses located in moderate-income geographies. The bank's market share for small loans to businesses in moderate-income geographies is somewhat below its overall market share.

Lending Gap Analysis

PBNA's lending within this AA was evaluated to determine if any unexplained or conspicuous gaps were identified regarding the geographic distribution of the bank's home mortgage loans. No unexplained or conspicuous gaps were identified.

Inside/Outside Ratio

We performed the inside/outside ratio lending analysis at the bank level. We based this determination on the contiguous nature of the bank's AAs, including two multistate MAs. Refer to analysis within the Parkersburg-Marietta MA section.

Distribution of Loans by Income Level of the Borrower

The overall distribution of home mortgage loans by income level of the borrower in the AA is excellent.

We considered the following factors in assessing the bank's lending performance to low- and moderate-income borrowers. For home mortgage loans, our review focused on the bank's lending performance relative to the level of low- and moderate-income families within the AA. Twenty-one percent of the AA is listed as low-income and 16 percent are listed as moderate-income. Additionally, 18 percent of the households in the AA are below the poverty level. Information obtained from local realtors and community organizations regarding the median and average sales price for single-family residences in the AA was used to determine the affordability of home mortgage loans for low-income borrowers. Based on this information, it was determined that home mortgage loan opportunities for low-income families in the AA are limited. This issue was factored into the analysis of home purchase and home refinance loans.

Home Mortgage Loans

Refer to Tables 8, 9, and 10 in Appendix D for the facts and data used to evaluate the borrower distribution of the bank's home mortgage loan originations and purchases.

Home Purchase Loans

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

PBNA's percentage of home purchase loans made to low-income borrowers is below the percentage of low-income families in the AA. Performance context issues outlined above mitigate this data. The bank's market share for home purchase loans to low-income borrowers is below its overall market share.

PBNA's percentage of home purchase loans to moderate-income borrowers significantly exceeds the percentage of moderate-income families in the AA. The bank's market share for home purchase loans to moderate-income borrowers exceeds its overall market share.

Home Improvement Loans

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

PBNA's percentage of home improvement loans made to low-income borrowers is below the percentage of low-income families in the AA. Performance context issues outlined above mitigate this data. The bank's market share for home purchase loans to low-income borrowers exceeds its overall market share.

PBNA's percentage of home improvement loans to moderate-income borrowers exceeds the percentage of moderate-income families in the AA. The bank's market share for home purchase loans to moderate-income borrowers is somewhat below its overall market share.

Home Refinance Loans

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

PBNA's percentage of home refinance loans made to low-income borrowers is below the percentage of low-income families in the AA. Performance context issues outlined above mitigate this data. The bank's market share for home refinance loans to low-income borrowers significantly exceeds its overall market share.

PBNA's percentage of home refinance loans to moderate-income borrowers exceeds the percentage of moderate-income families in the AA. The bank's market share for home refinance loans to moderate-income borrowers is somewhat below its overall market share.

Small Loans to Businesses

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

The borrower distribution of the bank's small loans to businesses is good. PBNA's percentage of small loans to businesses with revenues of \$1 million or less is near the percentage of businesses defined as such. The bank's market share of small loans to businesses with revenues of \$1 million or less meets its overall market share.

Additionally, a significant percentage of PBNA's small loans to businesses are for amounts of \$100,000 or less, which reflects the credit needs of the AA.

Community Development Lending

Refer to Table 1 Lending Volume in Appendix D for the facts and data used to evaluate the bank's level of community development lending. This table includes all community development loans, including multifamily loans that also qualify as community development loans. In addition, Table 5 includes geographic lending data on all multi-

family loans, including those that also qualify as community development loans. Table 5 does not separately list community development loans.

PBNA's level of CD lending is Outstanding, based on the available opportunities within the bank's AA. Based on a pro-rata share of the bank's deposits for the AA, the level of CD lending represents approximately 24 percent of Tier One Capital. These loans had a positive impact on the lending performance in the AA.

Within the Huntington-Ashland MSMA, PBNA made loans to provide economic development and revitalization and stabilization of existing urban areas. The major project funded by the bank during the evaluation period was the redevelopment of Putnam Square Shopping Center in an aging section of Greenup, KY. Once completed, the shopping center will provide jobs for low- and moderate-income individuals in the area and revitalize and stabilize a declining neighborhood. The bank's portion of a participation credit with five other area financial institutions was \$3 million. PBNA also provided \$813 thousand in funding to the Greenup-Boyd River Port Authority. The Port Authority is helping develop and expand the riverfront and river navigation facilities to enhance transportation options to further stimulate economic development and bring jobs to the area.

Three loans to the City of Greenup (\$732 thousand) were instrumental in repairing and extending the city's water line infrastructure. Total qualified community development loans made to this AA during the evaluation period was approximately \$4.5 million.

Product Innovation and Flexibility

PBNA offers several flexible home mortgage products, as detailed below. These programs are designed to assist low- and moderate-income borrowers obtain financing. Loans originated under these products were evaluated as home mortgage loans under the Lending Test. Affordable mortgage products aimed at LMI households was identified as a credit need of the community. The bank's flexible home mortgage products focus on these needs and have had a positive impact on the lending performance of the AA.

- The bank's Residential Assistance Program (RAP) includes flexible criteria, including 5 percent down payment, no minimum loan amounts, no points, no private mortgage insurance requirement, and higher qualifying debt ratios. Eligibility for the program is based on HUD's annual family income schedule. During the evaluation period, the bank originated 6 RAP loans within the AA totaling \$269 thousand.
- The bank's My Community Mortgage (MCM) program includes flexible criteria, including no minimum borrower contribution, temporary interest rate buy-down eligibility, longer terms and interest-only periods, reserve flexibility, standard Fannie Mae guidelines pertaining to flexible sources of funds for closing costs and remaining down payment, nontraditional credit evaluations, as well as

nontraditional income sources. During the evaluation period, the bank originated 3 MCM loans within the AA totaling \$ 316 thousand.

- The Welcome Home Grant Program (WHGP) is targeted to households whose incomes are at or below 80 percent of Mortgage Revenue Bond (MRB) income limits, as adopted by the appropriate state housing finance agency, adjusted for family size. The WHGP program requires the homebuyer to contribute at least \$500 of their own funds toward down payment and closing costs however, 60% of these funds may be received as a gift. The bank must provide some form of measurable contribution (i.e. waivers, reduced points, below market interest rates, etc) towards the household's mortgage financing. Borrowers are required to complete a homebuyers-counseling program and remain in the home for a period of five years without refinancing or selling the dwelling. Welcome home grant will be reduced if origination fee is greater than one percent, or if discount points charged are greater than one-half on one percent. During the review period, the bank originated 14 WHGP loans within the AA totaling \$95 thousand.
- The Rural Development Housing and Community (RDHC) Loan can be used to build, repair, renovate or relocate a home, or to purchase and prepare sites, including providing water and sewage facilities. The program includes flexible criteria, including an income of up to 115 percent of the median income for the area, 30 year loan terms, and no down payment. During the review period, the bank originated 2 RDHC loans within the AA totaling \$188 thousand.

Conclusions for PBNA's 2003 Lending Performance

We reviewed PBNA's lending performance for 2003 by analyzing the bank's submitted data separately from 2004 and 2005 data, as explained in The Scope of the Evaluation section of this report. We found that PBNA's performance is not inconsistent with the bank's performance during 2004 and 2005.

INVESTMENT TEST

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

PBNA's performance under the Investment Test in the Huntington-Ashland MA is rated "Outstanding." Based on a full scope review, the bank's performance in the AA is excellent.

Investments met social service needs through investments in economic development and school bonds along with donations to community organizations with community development purpose. In formulating our conclusions, we considered the bank's level of capacity, dollar amount of investments, community development opportunities, and identified credit needs. More weight was given to the bank's limited presence in this AA and the lack of qualified investment opportunities within the AA. We identified a moderate level of investment opportunities. Refer to the Market Profile for Huntington-

Ashland MSA in Appendix C for needs and opportunities. The opportunity to invest was primarily in charitable donations and grants. We did not identify any local low-income housing projects. The bank's investments are not innovative or complex.

During the review period, the bank made 78 investments totaling \$844 thousand.

Investment activities included:

- Northeast KY Regional Industrial Authority Inc - Encourages economic development in a five-county region encompassing the majority of the Huntington-Ashland MSMA. The bank has allocated \$450,000 of the cost to this MSMA.
- Greenup County School Bonds – Bonds support Greenup County Schools with large LMI student populations. The bank's investment in two bonds during the evaluation period for this AA is \$350 thousand.
- Donations - The bank made 55 donations totaling \$44 thousand to local community organizations that provide community and social services to low- and moderate-income persons as well as community economical development projects.

SERVICE TEST

The bank's performance under the Service Test in the Huntington-Ashland MA is rated Outstanding. Based on a full-scope review, the bank's performance in this AA is excellent. We placed the most weight on the distribution of the bank's branch delivery system in determining overall Service Test performance.

Retail Banking Services

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

In the Ashland-Huntington MA, PBNA's delivery systems are readily accessible to all portions of the AA. PBNA operates five full-service branches in the AA. The percentage of the bank's branches located in moderate-income geographies exceeds the percentage of the population residing in those geographies. The percentage of the bank's branches in the middle-income geographies closely approximates the percentage of the population residing in those geographies. Within the AA, there is 2.96% of the population in a low-income geography. The bank maintains six automated teller machines (ATM's) in the AA. Of these, one is located in a moderate-income geography and three are located in middle-income geographies. PBNA opened and closed six branches in the AA during the evaluation period. The changes were mostly due to the acquisition of Kentucky Bancshares in 2003 and the acquisition of Advantage Bank in 2004. The change in branch locations during the evaluation period resulted in one new branch in the moderate income-geographies and one branch closure in the middle-income geographies. Products, services and availability do not vary among branches in a manner that inconveniences individuals or geographies.

Community Development Services

PBNA provides an excellent level of CD services. Ten bank employees were involved in CD services in the AA. Seven of the bank employees are Board members to organizations that assist low-and moderate-income individuals with affordable housing and social services, assist small businesses or provide economic development. One of the organizations is a Housing Authority, which provides housing assistance to low- or moderate-income individuals and families. There was also one bank employee who taught banking at a school, at which most of the students are from low- or moderate-income families.

State Rating

State of Ohio

CRA Rating for Ohio ³ :	<u>Outstanding</u>
The lending test is rated:	<u>Outstanding</u>
The investment test is rated:	<u>Outstanding</u>
The service test is rated:	<u>Outstanding</u>

The major factors that support this rating include:

- Overall lending levels reflect a excellent responsiveness to meeting the credit needs of the AA.
- The geographic distribution of loans is excellent. The geographic distribution of home mortgage loans and small loans to businesses is excellent.
- The distribution of loans by income level of the borrower is excellent. The distribution of home mortgage loans by borrower income level is excellent. The distribution of small loans to businesses with annual revenues of \$1 million or less is excellent.
- Community Development lending had a positive impact on the lending test conclusions.
- Given the available opportunities within the bank's assessment area, the level of qualified investments is excellent.
- Delivery systems are readily accessible to all geographies and individuals of different income levels throughout its AAs.

³ For institutions with branches in two or more states in a multistate metropolitan area, this statewide evaluation does not reflect performance in the parts of this state contained within the multistate metropolitan area. Refer to the multistate metropolitan area rating and discussion for the rating and evaluation of the institution's performance in that area.

Description of Institution's Operations in Ohio

PBNA operates in the Columbus MA and six Non-MA counties within the state of Ohio. The majority of the bank's Ohio deposits, loans and branches are located within the Non-MA counties, which are contiguous to both the Parkersburg-Marietta MA and Huntington-Ashland MA.

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

Scope of Evaluation in Ohio

PBNA's Non-MA of Ohio AA contains portions of six Ohio counties that are not located within a metropolitan statistical area. For the purposes of this evaluation, those geographies were combined into a single AA and received a full-scope review. These geographies represent PBNA's major markets in the state and account for 90 percent of the loans originated in Ohio.

The Columbus MA received a limited-scope review based on the limited presence the bank has in that AA. PBNA has only one branch within the MA and has delineated only four geographies as its AA.

The ratings for Ohio are based primarily on the results of the Non-MA of Ohio AA, which received a full-scope review. Loans, Investments and Services within the multi-state Parkersburg-Marietta MA were not considered in the evaluation for the state of Ohio.

LENDING TEST

Conclusions for Areas Receiving Full-Scope Reviews

The bank's performance under the lending test in the state of Ohio is rated Outstanding. Based on the full-scope review, the bank's lending performance in the Non-MA of Ohio AA is excellent.

We placed more emphasis on home mortgage loans when evaluating product performance based on identified credit needs and the fact that PBNA originated more home mortgage loans than small loans to businesses. Based on volume we placed more weight on home purchase loans (467). Home mortgage refinance loans (379) received moderate weight and home improvement loans (203) received the least weight. Because the number of the bank's multifamily loans is not significant enough to perform a meaningful analysis, we did not consider multifamily loans in evaluating the bank's geographic distribution of loans in the AA.

Lending Activity

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

Overall lending levels reflect excellent responsiveness to meeting the credit needs of the AA. Relative to its deposit market rank, PBNA's home mortgage lending levels are excellent and its small business lending levels are good. Within the AA, the bank ranks second in deposits (14 percent market share), first in home mortgages (8 percent market share) and eighth in small loans to businesses (6 percent market share). By home mortgage product, PBNA ranks first (8 percent market share) for home purchase, first (14 percent market share) for home improvement and second (6 percent market share) for home refinance loans.

Distribution of Loans by Income Level of the Geography

The overall geographic distribution of loans in the Non-MA of Ohio AA is excellent. The geographic distribution for home mortgage loans is excellent and for small loans to businesses it is also excellent.

We considered the following factors in assessing the bank's lending performance in low- and moderate-income geographies. For home mortgage loans, our review focused on the bank's lending performance relative to the level of owner-occupied units in low- and moderate-income geographies. The AA has less than 1 (.12) percent of its owner-occupied housing units in low-income geographies and 33.94 percent in moderate-income geographies. For small loans to businesses, our review focused on the bank's lending performance relative to the percentage of businesses located within low- and moderate-income geographies. The AA has slightly over 1 (1.18) percent of its businesses located in low-income geographies and 33.82 percent in moderate-income geographies.

Home Mortgage Loans

Refer to Tables 2, 3, 4, and 5 in Appendix D for the facts and data used to evaluate the geographic distribution of the bank's home mortgage loan originations/purchases.

Home Purchase Loans

The geographic distribution of the bank's home purchase loans in the Non-MA of Ohio AA is excellent. PBNA's percentage of home purchase loans made in low-income geographies exceeds the percentage of owner-occupied housing units within the same. The bank's market share for home purchase loans in low-income geographies is below its overall market share. PBNA's percentage of home purchase loans made in moderate-income geographies significantly exceeds the percentage of owner-occupied housing units within the same. The bank's market share for home purchase loans made in moderate-income geographies exceeds its overall market share.

Home Improvement Loans

The geographic distribution of the bank's home improvement loans in the Non-MA of Ohio AA is excellent. PBNA did not make any home improvement loans in low-income geographies. The percentage of owner-occupied units in the low-income geographies is less than 1 percent thus limiting opportunity. The bank's percentage of home improvement loans made in moderate-income geographies significantly exceeds the percentage of owner-occupied housing units within the same. The bank's market share for home improvement loans in moderate-income geographies exceeds its overall market share.

Home Refinance Loans

The geographic distribution of the bank's home refinance loans in the Non-MA of Ohio AA is excellent. PBNA's percentage of home refinance loans made in low-income geographies is lower than the percentage of owner-occupied housing units within the same. The percentage of owner-occupied units in the low-income geographies is less than 1 percent thus limiting opportunity. PBNA's percentage of home refinance loans made in moderate-income geographies significantly exceeds the percentage of owner-occupied housing units within the same. The bank's market share for home refinance loans in moderate-income geographies exceeds its overall market share.

Small Loans to Businesses

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

The geographic distribution of the bank's small loans to businesses in the Non-MA of Ohio is excellent. PBNA's percentage of small loans to businesses is near the percentage of businesses located within low-income geographies. PBNA's percentage of small loans to businesses significantly exceeds the percentage of businesses located within moderate-income geographies. The bank's market share for small loans to businesses in low-income geographies is near its overall market share and exceeds overall market share in moderate-income geographies.

Lending Gap Analysis

PBNA's lending within the state of Ohio was evaluated to determine if any unexplained or conspicuous gaps were identified regarding the geographic distribution of the bank's home mortgage and small business loans. No unexplained or conspicuous gaps were identified.

Inside/Outside Ratio

We performed the inside/outside ratio lending analysis at the bank level. We based this determination on the contiguous nature of the bank's AAs, including two multistate MAs. Refer to analysis within the Parkersburg-Marietta MA section.

Distribution of Loans by Income Level of the Borrower

The overall distribution of loans by income level of borrower in the Non-MA of Ohio AA is excellent. The distribution of home mortgage loans by borrower income level is excellent. The distribution of small loans to businesses with annual revenues of \$1 million or less is excellent.

We considered the following factors in assessing the bank's performance to low- and moderate-income borrowers. For home mortgage loans, our review focused on the bank's lending performance relative to the level of low- and moderate-income borrowers within the AA. Twenty-six (26.09) percent of the AA is listed as low-income and 20.96 percent is listed as moderate-income. Additionally, 20 percent of the households in the AA are below the poverty level. Information obtained from local realtors and community organizations regarding the median and average sales price for single-family residences in the AA was used to determine the affordability of home mortgage loans for low-income borrowers. Based on this information, it was determined that home mortgage opportunities for low-income families in the AA are limited. This issue was factored into the analysis of home mortgage loans.

For small loans to businesses, our review focused on the bank's lending performance relative to the percentage of businesses with annual revenues of \$1 million or less. Sixty-two (62.05) percent of the businesses located in the AA have reported gross annual revenues of \$1 million or less.

Home Mortgage Loans

Refer to Tables 8, 9 and 10 in Appendix D for the facts and data used to evaluate the borrower distribution of the bank's home mortgage loan originations and purchases.

Home Purchase Loans

The borrower distribution of the bank's home purchase loans in the Non-MA of Ohio AA is excellent.

PBNA's percentage of home purchase loans to low-income borrowers is lower than the percentage of low-income families in the AA. Performance context issues outlined above mitigate this data. The bank's market share for home purchase loans to low-income borrowers significantly exceeds its overall market share. PBNA is also the overall leader, ranking first in market share among 63 lenders. PBNA's percentage of home purchase loans to moderate-income borrowers exceeds the percentage of moderate-income families in the AA. The bank's market share for home purchase loans to moderate-income borrowers meets its overall market share.

Home Improvement Loans

The borrower distribution of the bank's home improvement loans in the Non-MA of Ohio AA is excellent.

PBNA's percentage of home improvement loans to low-income borrowers exceeds the percentage of low-income families in the AA. PBNA's percentage of home improvement loans to moderate-income borrowers significantly exceeds the percentage of moderate-income families in the AA. The bank's market share for home improvement loans to both low- and moderate-income families significantly exceeds and is near its overall market share respectively.

Home Refinance Loans

The borrower distribution of the bank's home refinance loans in the Non-MA of Ohio AA is excellent.

PBNA's percentage of home refinance loans to low-income borrowers is lower than the percentage of low-income families in the AA. Performance context issues outlined above mitigate this data. The bank's market share for home refinance loans to low-income borrowers exceeds its overall market share. PBNA is a leader in the AA, ranking first out of 74 lenders for home refinance loans to low-income borrowers.

PBNA's percentage of home refinance loans to moderate-income borrowers significantly exceeds the percentage of moderate-income families in the AA. The bank's market share for home refinance loans to moderate-income borrowers exceeds its overall market share.

Small Loans to Businesses

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

The borrower distribution of the bank's small loans to businesses in the Non-MA of Ohio AA is excellent. PBNA's percentage of loans to businesses with revenues of \$1 million or less significantly exceeds the percentage of businesses defined as such. The bank's market share for loans to businesses with revenues of \$1 million or less also significantly exceeds its overall market share. Additionally, a substantial percentage of PBNA's loans were for amounts of \$100,000 or less.

Community Development Lending

Refer to Table 1 Lending Volume in 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. In addition, Table 5 includes geographic lending data on all multi-family loans, including those that also qualify as CD loans. Table 5 does not separately list CD loans, however.

PBNA's level of CD lending is excellent based on the available opportunities within the bank's AA. Based on a pro-rata share of the bank's deposits for the AA, the level of CD lending represents approximately 23 percent of Tier One Capital. These loans had a positive impact on the lending performance in the AA.

Within the Ohio Non-MA, PBNA made loans to promote economic development and revitalization and stabilization in LMI and federally designated distressed geographies within the AA as well as assist community agencies providing affordable housing. A total of twenty-five qualified community development loans were made to this AA during the evaluation period for approximately \$7.2 million.

The major project funded by the bank during the evaluation period was the rehabilitation of nine student apartment buildings in the city of Athens aiding in the revitalization and stabilization of the area. Funding for this project was \$6 million. Other economic development loans went toward an industrial park in Guernsey County, community services equipment purchases and infrastructure repairs in various villages in the AA to revitalize and stabilize these communities. All of these communities were in either low- or moderate-income geographies or federally designated distressed geographies.

PBNA also provided approximately \$400 thousand in funding for various community action agencies specializing in affordable housing for its clients. These funds were utilized for home construction and to support existing housing programs within these agencies.

Product Innovation and Flexibility

PBNA offers several flexible home mortgage products, as detailed below. These programs are designed to assist low- and moderate-income borrowers obtain financing. Loans originated under these products were evaluated as home mortgage loans under the Lending Test. While all programs provide flexible terms and conditions, the Disaster Loan program by PBNA is considered innovative as it was implemented in response to several floods which occurred during the evaluation period. Affordable mortgage products aimed at LMI households was identified as a credit need of the community. The bank's flexible home mortgage products focus on these needs and have had a positive impact on the lending performance of the AA.

- The bank's Residential Assistance Program (RAP) includes flexible criteria, including 5 percent down payment, no minimum loan amounts, no points, no private mortgage insurance requirement, and higher qualifying debt ratios. Eligibility for the program is based on HUD's annual family income schedule. During the evaluation period, the bank originated 23 RAP loans within the AA totaling \$1.1 million.
- The bank's Disaster Loan Program (DLP) is targeted to customers that have suffered a loss due to a disaster. The DLP is an unsecured loan which is offered at a lower rate, with a maximum loan amount of \$5 thousand for homeowners

and \$2,500 for renters. The maximum term for the loan is 5 years for homeowners and 3 years for renters, depending upon amount received. During the evaluation period, the bank originated 6 Disaster loans within the AA totaling \$17 thousand.

- The bank's My Community Mortgage (MCM) program includes flexible criteria, including no minimum borrower contribution, 2-1 temporary interest rate buy-down eligibility, longer terms and interest-only periods, reserve flexibility, standard Fannie Mae guidelines pertaining to flexible sources of funds for closing costs and remaining down payment, nontraditional credit evaluations, as well as nontraditional income sources. During the evaluation period, the bank originated 23 MCM loans within the AA totaling \$1.6 million.
- The Community Housing Improvement Program (CHIP) Down Payment Program promotes home ownership opportunities through outreach and education activities that primarily serve low and moderate income individuals and families. The CHIP program includes the following criteria: no origination fee low down payment, waiver of the PMI requirement, and assistance with down payment and closing cost up to \$15 thousand. During the evaluation period, the bank originated 7 CHIP loan within the AA totaling \$302 thousand.
- The Welcome Home Grant Program (WHGP) is targeted to households whose incomes are at or below 80 percent of Mortgage Revenue Bond (MRB) income limits, as adopted by the appropriate state housing finance agency, adjusted for family size. The WHGP program requires the homebuyer to contribute at least \$500 of their own funds toward down payment and closing costs, however, 60% of these funds may be received as a gift. The bank must provide some form of measurable contribution (i.e. waivers, reduced points, below market interest rates, etc) towards the household's mortgage financing. Borrowers are required to complete a homebuyers-counseling program and remain in the home for a period of five years without refinancing or selling the dwelling. Welcome home grant will be reduced if origination fee is greater than one percent, or if discount points charged are greater than one-half on one percent. During the review period, the bank originated 51 WHGP loans within the AA totaling \$262 thousand.
- The Ohio Housing Loan (OHL) is targeted to households that fall within the Ohio Housing Finance Agency maximum family income parameters. The OHL loan is a 30 year fixed rate loan with the option of a 100 percent LTV. The down payment assistance program provides a 2 percent grant that can be applied towards closing costs with no repayment of funds required. For a second mortgage a 4 percent grant with a minimal 20 year term is also available at a rate that is 2 percent above the unassisted first mortgage rate. During the review period, the bank originated 2 OHL loans within the AA totaling \$193 thousand.

Conclusions for PBNA's 2003 Lending Performance

We reviewed PBNA's lending performance for 2003 by analyzing the bank's submitted data separately from 2004 and 2005 as explained in The Scope of the Evaluation section of this report. We found that PBNA's performance is not inconsistent with the bank's performance during 2004 and 2005.

Conclusions for Area Receiving Limited-Scope Reviews

PBNA's Columbus OH MA AA contains all census tracts within Lancaster County. For the purposes of this evaluation, these geographies were combined into a single AA and received a limited-scope review.

Based on the limited-scope review, the bank's performance under the lending test in the Columbus MA is not inconsistent with the State of Ohio's overall Outstanding performance.

INVESTMENT TEST

Conclusions for Areas Receiving Full-Scope Reviews

The bank's performance under the investment test in Ohio is rated Outstanding. Based on full-scope reviews, the bank's performance in the Non-MA of Ohio is excellent.

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

Investments are primarily centered in donations, affordable housing projects, economic development, as well as prior period investments in affordable housing and community and social service needs. The bank committed to invest significant dollars into statewide low-income housing tax credit (LIHTC) projects. When drawing conclusions we considered the bank's level of capacity, dollar amount of investments, community development opportunities, and identified credit needs.

We identified a moderate level of investment opportunities. When drawing conclusions, we placed more weight on the dollar and volume of investments that were distributed to a number of active community organizations. Refer to the Market Profile for the Non-MA of Ohio AA in Appendix C for needs and opportunities. The opportunity to invest is primarily in charitable donations, affordable housing, economic development and grants. We did not identify any school bonds for low-and moderate-income individuals or agencies that serve low- and moderate-income individuals.

During the evaluation period, PBNA committed to and began investing in two LIHTC projects through the Ohio Capital Corporation. One project in these statewide LIHTC projects is located in this AA (Meigs County). Given the proximity of the AAs and the regional benefit of these projects, we allocated the bank's investment in the Ohio

Finance Fund based on its pro-rata share of PBNA deposits within the AA. The bank's investments are not considered innovative or complex.

During the review period, the bank made 164 investments totaling \$1.9 million.

Investment activities included:

- Ohio Equity Funds Project IX – Allocated funding in this AA is \$857 thousand. This Fund contains 20 properties with 939 affordable housing units. The allocated unfunded commitment for this project is \$309 thousand.
- Ohio Equity Fund Project XI – Allocated funds for this project in the AA is \$731 thousand. This Fund contains 28 properties with 1,918 affordable housing units. Properties located within this AA include Colonial Park Property in Meigs County, Ohio that has 48 units of low- and moderate-income housing. The allocated unfunded commitment is \$ 440 thousand.
- Appalachian Ohio Development Fund LP – An Ohio fund which invests in small businesses throughout an eleven-county region in southeastern Ohio. The unallocated portion of the bank's investment in this AA is \$105 thousand.
- Ohio Finance Fund - Allocated funds for the AA is \$160 thousand. This fund uses investments from the New Markets Tax Credit allocation to make loans to qualifying applicants of low-income census tracts and businesses in the state of Ohio. Business purposes include start-up monies and funds to expand early stage and mature businesses.
- Donations - During the review period, the bank made 161 donations totaling \$164 thousand in the Ohio Non- MSA to local community organizations that provide community and social services to low- and moderate-income individuals and families, as well as community economic development projects.

Conclusions for Area Receiving Limited-Scope Reviews

Based on the limited-scope review, the bank's performance under the investment test in the Columbus MA is not inconsistent with the State of Ohio's overall Outstanding performance.

Refer to Table 14 in Appendix D 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 Ohio is rated Outstanding. Based on full-scope reviews, the bank's performance in the Non-MA of Ohio AA is excellent. We

placed the most weight on the distribution of the bank's branch delivery system in determining overall Service Test performance.

Retail Banking Services

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

In the Non-MA of Ohio AA, PBNA's delivery systems are readily accessible to all portions of the assessment area. The bank operates 18 full-service branches in the AA. One of the bank's branches in the AA is located in a middle-income non-metropolitan distressed and underserved area. Delivery systems are readily accessible to the AA, particularly the moderate-income geographies, where the percentage of the bank's branches exceeds the percentage of the population residing in those geographies. Population in the low-income geographies is less than 2 percent of the population in the AA. The bank maintains 14 automated teller machines (ATMs) within the AA. Of these, six (43 percent) are located in moderate-income geographies, and eight (57 percent) are located in middle-income geographies. Seven of the eight ATM's in the middle-income geographies, are located in distressed or underserved areas. Products, services and availability do not vary in a way that inconveniences any portion or individuals in the AA. There was one branch closure in the moderate income geographies during the evaluation period.

Community Development Services

PBNA provides an excellent level of CD services to the AA. PBNA increased their community development services from the previous evaluation. Seventeen bank employees are involved in CD services within the AA. Thirteen of the bank employees provided financial instruction or expertise to the organizations. Homebuyer education, financial planning, budget planning, banking, and parent financial education were some of the topics the bank employee's presented. There are six bank employees who serve as Board members in organizations that assist small businesses or low-moderate income individuals. PBNA also cashes checks for no fee for employees of a low-income employer located within the AA.

Conclusions for Areas Receiving Limited-Scope Reviews

Based on the limited-scope review, the bank's performance under the service test in Columbus MA is not inconsistent with the bank's overall outstanding performance under the service test in Ohio.

Refer to Table 15 in Appendix D for the facts and data that support these conclusions.

State Rating

State of Kentucky

CRA Rating for Kentucky ⁴ :	<u>Satisfactory</u>
The lending test is rated:	<u>Low Satisfactory</u>
The investment test is rated:	<u>Low Satisfactory</u>
The service test is rated:	<u>High Satisfactory</u>

The major factors that support this rating include:

- Overall lending levels reflect an adequate responsiveness to meeting the credit needs of the AA.
- The distribution of loans by income level of the borrower is adequate. The distribution of home mortgage loans by borrower income level is adequate. The distribution of small loans to businesses with annual revenues of \$1 million or less is excellent.
- Given the available opportunities within the bank's AA, the level of qualified investments is adequate.
- Delivery systems are accessible to all geographies and individuals of different income levels throughout its AAs.

⁴ For institutions with branches in two or more states in a multistate metropolitan area, this statewide evaluation does not reflect performance in the parts of this state contained within the multistate metropolitan area. Refer to the multistate metropolitan area rating and discussion for the rating and evaluation of the institution's performance in that area.

Description of Institution's Operations in Kentucky

Refer to the market profile for the Non-MA of Kentucky in Appendix C for detailed demographics and other performance context information.

Scope of Evaluation in Kentucky

PBNA's AA in the State of Kentucky contains only one county (Carter County) and is not located within a metropolitan statistical area. This Non-MA AA was created through the realignment of MSA's during 2004 and received a full-scope review. Data for this AA include 2004 and 2005 only.

The ratings of Kentucky are based solely on the results of the Non MA of Kentucky AA. Loans, Investments and Services within the multi-state Huntington-Ashland MA were not considered in the evaluation for the state of Kentucky.

LENDING TEST

Conclusions for Areas Receiving Full-Scope Reviews

The bank's performance under the lending test in the state of Kentucky is rated Low Satisfactory. Based on the full-scope review, the bank's performance in the Non-MA of Kentucky AA is adequate.

We placed more emphasis on home mortgage loans when evaluating product performance based on identified credit needs and the fact that PBNA originated more home mortgage loans (31) than small loans to businesses (7). Based on volume, we placed equal weight on all home mortgage loans.

Lending Activity

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

Overall lending levels reflect adequate responsiveness to meeting the credit needs of the AA. Relative to its deposit market rank, PBNA's home mortgage lending levels are adequate and its small business lending levels are good. Within the AA, the bank ranks third in deposits (4.89 percent market share). The other 2 institutions ranking higher in deposit market share in the Kentucky non-MA area hold deposit market shares of 46.74 percent and 42.05 percent respectively. The bank ranks fourteenth in home mortgages (2 percent market share) and eleventh in small loans to businesses (2 percent market share). By home mortgage product, PBNA ranks twenty-third (1 percent market share) in home purchase, seventh (5 percent market share) in home improvement and ninth (2 percent market share) in home refinance loans.

Distribution of Loans by Income Level of the Geography

There are no low- or moderate-income geographies within PBNA's Non-MA of Kentucky AA. As such, an analysis of the geographic distribution of loans would not be meaningful.

Lending Gap Analysis

PBNA's lending within this AA was evaluated to determine if any unexplained or conspicuous gaps were identified regarding the geographic distribution of the bank's home mortgage and small business loans. No unexplained or conspicuous gaps were identified.

Inside/Outside Ratio

We performed the inside/outside ratio lending analysis at the bank level. We based this determination on the contiguous nature of the bank's AAs, including two multistate MAs. Refer to analysis within the Parkersburg-Marietta MA section.

Distribution of Loans by Income Level of the Borrower

The overall distribution of loans by income level of borrower in the Non-MA of Kentucky AA is adequate. The distribution of home mortgage loans by borrower income is adequate. The distribution of small loans to businesses with annual revenues of \$1 million or less is good.

We considered the following factors in assessing the bank's performance to low- and moderate-income borrowers. For home mortgage loans, our review focused on the bank's lending performance relative to the level of low- and moderate-income borrowers within the AA. Twenty-five (25.42) percent of the AA is listed as low-income and 16.10 percent is listed as moderate-income. Additionally, 22 percent of the households in the AA are below the poverty level. Information obtained from local realtors and community organizations regarding the median and average sales price for single-family residences in the AA was used to determine the affordability of home mortgage loans for low-income borrowers. Based on this information, it was determined that home mortgage opportunities for low-income families in the AA are limited. This issue was factored into the analysis of home purchase and home refinance loans.

For small loans to businesses, our review focused on the bank's lending performance relative to the percentage of businesses with annual revenues of \$1 million or less. Fifty eight (58.11) percent of the businesses located in the AA have reported gross annual revenues of \$1 million or less.

Home Mortgage Loans

Refer to Tables 8, 9 and 10 in Appendix D for the facts and data used to evaluate the borrower distribution of the bank's home mortgage loan originations and purchases.

Home Purchase Loans

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

PBNA's percentage of home purchase loans to low-income borrowers is lower than the percentage of low-income families in the AA. Performance context issues outlined above mitigate this data. The bank's market share for home purchase loans to low-income borrowers is below its overall market share. PBNA's percentage of home purchase loans to moderate-income borrowers exceeds the percentage of moderate-income families in the AA. The bank's market share for home purchase loans to moderate-income borrowers is below its overall market share.

Home Improvement Loans

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

PBNA's percentage of home improvement loans to low-income borrowers significantly exceeds the percentage of low-income families in the AA. The bank's market share for home improvement loans to low-income borrowers is below its overall market share.

PBNA's percentage of home improvement loans to moderate-income borrowers is below the percentage of moderate-income families in the AA. The bank's market share for home improvement loans to moderate-income borrowers significantly exceeds its overall market share.

Home Refinance Loans

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

PBNA did not make any home refinance loans to low-income borrowers. The bank's market share for home refinance loans to low-income borrowers is below its overall market share.

PBNA's percentage of home refinance loans to moderate-income borrowers is below the percentage of moderate-income families in the AA. The bank's market share for home refinance loans to moderate-income borrowers is also below its overall market share.

Small Loans to Businesses

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

The borrower distribution of the bank's small loans to businesses is good. PBNA's percentage of loans to businesses with revenues of \$1 million or less substantially exceeds the percentage of businesses defined as such. The bank's market share of

loans to businesses with revenues of \$1 million or less significantly exceeds its overall market share. Additionally, a substantial percentage of PBNA's loan originations are for amounts of \$100,000 or less.

Community Development Lending

Refer to Table 1 Lending Volume in Appendix D for the facts and data used to evaluate the bank's level of community development lending.

The bank did not originate any qualified community development loans in this AA during the evaluation period.

Product Innovation and Flexibility

PBNA does offer a flexible home mortgage loan product targeted to low- or moderate-income individuals within its AA. The bank's Residential Assistance Program (RAP) includes flexible criteria including 5% down payment, no minimum loan amounts, no points, no private mortgage insurance requirement and higher qualifying debt ratios. Eligibility for the program is based on HUD's annual family income schedule

During the evaluation period, the bank originated 1 RAP loan within the AA totaling \$57 thousand.

INVESTMENT TEST

Conclusions for Areas Receiving Full-Scope Reviews

The bank's performance under the investment test in Kentucky is rated Low Satisfactory. Based on the full-scope review, the bank's performance in the Non-MA of Kentucky AA is adequate.

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

PBNA's satisfactory performance is a result of the moderate volume and dollar amount invested in relation to the bank's capacity, level of presence within the AA, identified opportunities and community needs. We identified a moderate level of investment opportunities. Refer to the Market Profile for the Non-MA of Kentucky AA in Appendix C.

The opportunity to invest was primarily in charitable donations and grants. We did not identify any LIHTC projects, school or economic development bonds for low- and moderate-income individuals or agencies that serve low- and moderate-income individuals. The bank's investments are not considered innovative or complex.

During the review period, the bank made 14 investments totaling \$ 55 thousand.

Investment activities included:

- Northeast KY Regional Industrial Authority Inc - Encourages economic development in a five-county region including Carter County. The bank has allocated \$50,000 of the cost to this AA.
- Donations - The bank made 13 donations totaling \$5 thousand to local community organizations that provide community and social services to low- and moderate-income persons as well as community economic development projects.

SERVICE TEST

Conclusions for Areas Receiving Full-Scope Reviews

The bank's performance under the service test in Kentucky is rated High Satisfactory. Based on full-scope reviews, the bank's performance in the Non-MA of Kentucky's AA is good. A realignment of the MSA moved Carter County into a new assessment area in 2004. The population of the AA is approximately 27 thousand with 4 different banks serving the same market area. We placed the most weight on the distribution of the bank's branch delivery system in determining overall Service Test performance.

Retail Banking Services

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

In the Non-MA of Kentucky, the delivery system is accessible to essentially all the assessment area. PBNA's delivery system includes one full service branch. There are no low, moderate, or upper income geographies in the AA. The branch operates in middle-income geographies which are designated as underserved or distressed. The percentage of the bank's branches in middle-income geographies is equal to the percentage of the population within middle-income geographies. There are no automated teller machines (ATMs) within that AA. The bank waives ATM usage fees for one non-affiliate ATM located in a middle-income geography designated as distressed or underserved. Products, services and availability do not vary in a way that inconveniences any portion or individuals in the AA. There were no branch closures or openings in the Kentucky Non-MA geographies during the evaluation period.

Community Development Services

PBNA provides an adequate level of CD services to the AA. There were two bank employees involved in CD services. One of the bank employee's is a Board member of an economic development organization and serves as a loan underwriter for the loan fund. The other bank employee provides bank training to students at a school primarily attended by low- or moderate-income individuals.

State Rating

State of West Virginia

CRA Rating for West Virginia⁵: **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:

- Overall lending levels reflect good responsiveness to meeting the credit needs of the AA.
- The distribution of loans by income level of the borrower is good. The distribution of home mortgage loans by borrower income level is good. The distribution of small loans to businesses with annual revenues of \$1 million or less is excellent.
- Given the available opportunities within the bank's AA, the level of qualified investments is adequate.
- Delivery systems are accessible to all geographies and individuals of different income levels throughout its AAs.

⁵ For institutions with branches in two or more states in a multistate metropolitan area, this statewide evaluation does not reflect performance in the parts of this state contained within the multistate metropolitan area. Refer to the multistate metropolitan area rating and discussion for the rating and evaluation of the institution's performance in that area.

Description of Institution's Operations in West Virginia

Refer to the market profile for the Non-MA of West Virginia in Appendix C for detailed demographics and other performance context information.

Scope of Evaluation in West Virginia

PBNA's AA contains portions of two West Virginia counties that are not located within a metropolitan statistical area. For the purposes of this evaluation, those geographies were combined into a single AA (Non MA of West Virginia AA) and received a full-scope review. These geographies represent PBNA's major markets in the state and account for 100 percent of the loans originated in West Virginia.

The ratings of West Virginia are based solely on the results of the Non MA of West Virginia AA. Loans, Investments and Services within the multi-state Parkersburg-Marietta MA and Huntington-Ashland MA were not considered in the evaluation for the state of West Virginia.

LENDING TEST

Conclusions for Areas Receiving Full-Scope Reviews

The bank's performance under the lending test in the state of West Virginia is rated High Satisfactory. Based on the full-scope review, the bank's performance in the Non-MA of West Virginia AA is good.

We placed more emphasis on home mortgage loans when evaluating product performance based on identified credit needs and the fact that PBNA originated more home mortgage loans (171) than small loans to businesses (33). Based on volume, we placed equal weight on all home mortgage loans

Lending Activity

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

Overall lending levels reflect good responsiveness to meeting the credit needs of the AA. Relative to its deposit market rank, PBNA's home mortgage lending levels are good and its small business lending levels are also good. Within the AA, the bank ranks first in deposits (28 percent market share), fourth in home mortgages (8 percent market share) and sixth in small loans to businesses (7 percent market share). By home mortgage product, PBNA ranks third (8 percent market share) in home purchase, third (16 percent market share) in home improvement and fifth (5 percent market share) in home refinance loans.

Distribution of Loans by Income Level of the Geography

There are no low- or moderate-income geographies within PBNA's Non-MA of West Virginia AA. As such, an analysis of the geographic distribution of loans would not be meaningful.

Lending Gap Analysis

PBNA's lending within this AA was evaluated to determine if any unexplained or conspicuous gaps were identified regarding the geographic distribution of the bank's home mortgage and small business loans. No unexplained or conspicuous gaps were identified.

Inside/Outside Ratio

We performed the inside/outside ratio lending analysis at the bank level. We based this determination on the contiguous nature of the bank's AAs, including two multistate MAs. Refer to analysis within the Parkersburg-Marietta MA section.

Distribution of Loans by Income Level of the Borrower

The overall distribution of loans by income level of borrower in the Non-MA of West Virginia AA is good. The distribution of home mortgage loans by borrower income is good. The distribution of small loans to businesses with annual revenues of \$1 million or less is excellent.

We considered the following factors in assessing the bank's performance to low- and moderate-income borrowers. For home mortgage loans, our review focused on the bank's lending performance relative to the level of low- and moderate-income borrowers within the AA. Twenty (20.70) percent of the AA is listed as low-income and 16.53 percent is listed as moderate-income. Additionally, 20 percent of the households in the AA are below the poverty level. Information obtained from local realtors and community organizations regarding the median and average sales price for single-family residences in the AA was used to determine the affordability of home mortgage loans for low-income borrowers. Based on this information, it was determined that home mortgage opportunities for low-income families in the AA are limited. This issue was factored into the analysis of home purchase and home refinance loans.

For small loans to businesses, our review focused on the bank's lending performance relative to the percentage of businesses with annual revenues of \$1 million or less. Fifty seven (57.32) percent of the businesses located in the AA have reported gross annual revenues of \$1 million or less.

Home Mortgage Loans

Refer to Tables 8, 9 and 10 in Appendix D for the facts and data used to evaluate the borrower distribution of the bank's home mortgage loan originations and purchases.

Home Purchase Loans

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

PBNA's percentage of home purchase loans to low-income borrowers is lower than the percentage of low-income families in the AA. Performance context issues outlined above mitigate this data. The bank's market share for home purchase loans to low-income borrowers significantly exceeds its overall market share.

PBNA's percentage of home purchase loans to moderate-income borrowers significantly exceeds the percentage of moderate-income families in the AA. The bank's market share for home purchase loans to moderate-income borrowers also significantly exceeds overall market share.

Home Improvement Loans

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

PBNA's percentage of home improvement loans to low-income borrowers is below the percentage of low-income families in the AA. Performance context issues outlined above mitigate this data. The bank's market share for home improvement loans to low-income borrowers is also below its overall market share.

PBNA's percentage of home improvement loans to moderate-income borrowers significantly exceeds the percentage of moderate-income families in the AA. The bank's market share for home improvement loans to moderate-income borrowers also exceeds its overall market share.

Home Refinance Loans

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

PBNA's percentage of home refinance loans to low-income borrowers is lower than the percentage of low-income families in the AA. Performance context issues outlined above mitigate this data. The bank's market share for home refinance loans to low-income borrowers significantly exceeds its overall market share. PBNA ranks third among thirteen lenders for home refinance loans to low-income borrowers in the AA.

PBNA's percentage of home refinance loans to moderate-income borrowers is below the percentage of moderate-income families in the AA. The bank's market share for home refinance loans to moderate-income borrowers is near its overall market share.

Small Loans to Businesses

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

The borrower distribution of the bank's small loans to businesses is excellent. PBNA's percentage of loans to businesses with revenues of \$1 million or less substantially exceeds the percentage of businesses defined as such. The bank's market share of loans to businesses with revenues of \$1 million or less significantly exceeds its overall market share. Additionally, a substantial percentage of PBNA's loan originations are for amounts of \$100,000 or less.

Community Development Lending

Refer to Table 1 Lending Volume in Appendix D for the facts and data used to evaluate the bank's level of community development lending.

PBNA's level of CD lending is adequate, based on the available opportunities within the bank's AA. Based on a pro-rata share of the bank's deposits for the AA, the level of CD lending represents approximately 19 percent of Tier One Capital. These loans had a positive impact on the lending performance in the AA.

The bank originated two loans to the villages of Wileyville and Flatrock to provide community services to low- and moderate-income individuals in middle-income non-metropolitan distressed geographies during the evaluation period. Total qualified community development loans made to this AA during the evaluation period was approximately \$811 thousand.

Product Innovation and Flexibility

PBNA offers several flexible home mortgage products, as detailed below. These programs are designed to assist low- and moderate-income borrowers obtain financing. Loans originated under these products were evaluated as home mortgage loans under the Lending Test. While all programs provide flexible terms and conditions, none are considered innovative. Affordable mortgage products aimed at LMI households was identified as a credit need of the community. The bank's flexible home mortgage products focus on these needs and have had a positive impact on the lending performance of the AA.

- The bank's Residential Assistance Program (RAP) includes flexible criteria, including 5 percent down payment, no minimum loan amounts, no points, no private mortgage insurance requirement, and higher qualifying debt ratios. Eligibility for the program is based on HUD's annual family income schedule. During the evaluation period, the bank originated 6 RAP loans within the AA totaling \$349 thousand.
- The bank's My Community Mortgage (MCM) program includes flexible criteria, including no minimum borrower contribution, temporary interest rate buy-down eligibility, longer terms and interest-only periods, reserve flexibility, standard Fannie Mae guidelines pertaining to flexible sources of funds for closing costs and remaining down payment, nontraditional credit evaluations, as well as

nontraditional income sources. During the evaluation period, the bank originated 5 MCM loans within the AA totaling \$221 thousand

- The Welcome Home Grant Program (WHGP) is targeted to households whose incomes are at or below 80 percent of Mortgage Revenue Bond (MRB) income limits, as adopted by the appropriate state housing finance agency, adjusted for family size. The WHGP program requires the homebuyer to contribute at least \$500 of their own funds toward down payment and closing costs, however, 60% of these funds may be received as a gift. The bank must provide some form of measurable contribution (i.e. waivers, reduced points, below market interest rates, etc) towards the household's mortgage financing. Borrowers are required to complete a homebuyers-counseling program and remain in the home for a period of five years without refinancing or selling the dwelling. Welcome home grant will be reduced if origination fee is greater than one percent, or if discount points charged are greater than one-half on one percent. During the review period, the bank originated 5 WHGP loans within the AA totaling \$16 thousand
- The Huntington WV Housing Authority's (HHA) loan is targeted to borrowers who fall within 30 to 50 percent of the area median income as determined by the WV income limits schedule, and is currently receiving section 8 rental assistance vouchers. The requirements are as follows: a down payment of 1 to 3 percent, if the borrower is not able to obtain the down payment, PBNA will provide assistance of up to \$1204.55 per low-income participant. During the review period, the bank originated 1 HHA loan within the AA totaling \$70 thousand.

Conclusions for PBNA's 2003 Lending Performance

We reviewed PBNA's lending performance for 2003 by analyzing the bank's submitted data separately from 2004 and 2005 data, as explained in The Scope of the Evaluation section of this report. We found that PBNA's performance is not inconsistent with the bank's performance during 2004 and 2005.

INVESTMENT TEST

Conclusions for Areas Receiving Full-Scope Reviews

The bank's performance under the investment test in West Virginia is rated Low Satisfactory. Based on the full-scope review, the bank's performance in the Non-MA of West Virginia AA is adequate.

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

PBNA's performance is a result of the small volume and dollar amount invested in relation to the bank's capacity, level of presence within the AA, identified opportunities and community needs. We identified a moderate level of investment opportunities. Refer to the Market Profile for the Non-MA of West Virginia AA in Appendix C.

The opportunity to invest was primarily in bonds and securities, charitable donations and grants. We did not identify any LIHTC projects for low-and moderate-income individuals or agencies that serve low- and moderate-income individuals. The bank's investments are not considered innovative or complex.

During the review period, the bank made 71 investments totaling \$308 thousand.

Investment activities included:

- Fannie Mae Mortgage Backed Securities - Securities held in mortgages originated in this AA in its middle-income non-metropolitan distressed geographies. The bank's investment in these securities is \$82 thousand.
- Mason County School Bonds – Bonds support Mason County Schools with large LMI student populations. The bank's investment in two bonds during the evaluation period for this AA is \$175 thousand.
- Donations - The bank made 58 donations totaling \$4 thousand to local community organizations that provide community and social services to low- and moderate-income persons as well as community economic development projects.

SERVICE TEST

Conclusions for Areas Receiving Full-Scope Reviews

The bank's performance under the service test in West Virginia is rated High Satisfactory. Based on the full-scope review, the bank's performance in the Non-MA of West Virginia AA is good.

Retail Banking Services

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

In the Non-MA of West Virginia, PBNA's delivery systems are accessible to essentially all portions of the assessment area. The bank operates five full-service branches in the AA. Four of the five branches are located in middle-income geographies designated as distressed or underserved. The percentage of the bank's branches in the middle-income geographies closely approximates the percentage of the population residing in those geographies. There are no low- or moderate-income geographies in the AA. Products, services and availability do not vary in a way that inconveniences any portion or individuals in the AA. The bank maintains four automated teller machines (ATM's) in the AA. The four ATM's are located in middle-income geographies designated as distressed or underserved. There were no branch openings or relocations of branches or closures during the evaluation period.

Community Development Services

PBNA provides a good level of community development services in the AA. Five bank employees conducted financial education seminars in several organizations within the AA. The organizations target low-moderate income individuals. One of the bank employee's is also a Board member for two organizations, one of which provides help to low-moderate income individuals, including grant, clothing, utility bills and Christmas supplies. The other organization is involved in economic development in the area.

Appendix A: Scope of Examination

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 non-metropolitan 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): 01/01/2003 to 12/31/2005 Investment and Service Tests and CD Loans: 06/02/2002 through October 23, 2006	
Financial Institution	Products Reviewed	
Peoples Bank, N.A. (PBNA) Marietta, Ohio	Home Mortgage Loans Small Loans to Businesses Community Development Loans	
Affiliate(s)	Affiliate Relationship	Products Reviewed
NA		
List of Assessment Areas and Type of Examination		
Assessment Area	Type of Exam	Other Information
Parkersburg-Marietta MA	Full-Scope	County of Washington, OH County of Wood, WV
Huntington-Ashland MA	Full-Scope	Counties of Boyd, Carter, Greenup, KY AA includes 1 geography in Cabell County, WV
Non-MA of Ohio	Full-Scope	Counties of Athens, Galia, Hocking, Meigs, Morgan, Noble, OH
Non-MA of West Virginia	Full-Scope	Counties of Mason and Wetzell, WV
Non-MA of Kentucky	Full Scope	County of Carter, Kentucky
Columbus MA	Limited-Scope	AA includes 4 geographies in Fairfield County, OH

Appendix B: Summary of Multistate Metropolitan Area and State Ratings

RATINGS Peoples Bank N.A.				
Overall Bank:	Lending Test Rating*	Investment Test Rating	Service Test Rating	Overall Bank/State/Multistate Rating
Peoples Bank, N.A.	Outstanding	Outstanding	Outstanding	Outstanding
Multistate Metropolitan Area or State:				
Parkersburg-Marietta MA	Outstanding	Outstanding	Outstanding	Outstanding
Huntington-Ashland MA	High Satisfactory	Outstanding	Outstanding	Outstanding
State of Ohio	Outstanding	Outstanding	Outstanding	Outstanding
State of West Virginia	High Satisfactory	Low Satisfactory	High Satisfactory	Satisfactory
State of Kentucky	Low Satisfactory	Low Satisfactory	High Satisfactory	Satisfactory

(*) The lending test is weighted more heavily than the investment and service tests in the overall rating.

Appendix C: Market Profiles for Full-Scope Areas

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Market Profiles for Areas Receiving Full-Scope Reviews

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Parkersburg-Marietta MA

Demographic Information for Full-Scope Area: Parkersburg-Marietta MA						
Demographic Characteristics	#	Low % of #	Moderate % of #	Middle % of #	Upper % of #	NA* % of #
Geographies (Census Tracts/BNAs)	43	0.00	18.60	67.44	13.95	0.00
Population by Geography	151,237	0.00	12.42	75.34	12.25	0.00
Owner-Occupied Housing by Geography	45,786	0.00	9.25	77.02	13.73	0.00
Businesses by Geography	8,361	0.00	30.25	60.65	9.10	0.00
Farms by Geography	313	0.00	10.86	73.48	15.65	0.00
Family Distribution by Income Level	42,777	18.47	19.09	21.88	40.57	0.00
Distribution of Low- and Moderate-Income Families throughout AA Geographies	16,065	0.00	15.47	76.99	7.54	0.00
Median Family Income HUD Adjusted Median Family Income for 2005 Households Below the Poverty Level	= \$40,321 = \$48,200 = 13%	Median Housing Value Unemployment Rate		= \$75,275 = 5.2%		

(*) The NA category consists of geographies that have not been assigned an income classification.
Source: 2000 U.S. Census, and 2005 HUD updated MFI.

The AA consists of the entire Parkersburg-Marietta, WV-OH MA. This AA meets the requirements of the regulation and does not arbitrarily exclude low- or moderate-income geographies. The Parkersburg-Marietta MSMA is a multi-state MA, which includes Wood County in West Virginia and Washington County in Ohio. Wood County is located on the northwestern border of West Virginia along the Ohio River and is smaller than Washington County in total area. Vienna, Williamstown, and the county seat of Parkersburg are the county's largest municipalities. In Washington County, Marietta is the county seat. Within the AA there are no low-income geographies, eight moderate-income geographies, 29 middle-income geographies, and six upper-income geographies.

PBNA has 13 full service branches and ten ATMs in the AA, which conduct traditional banking services. The bank's primary business focus in the AA is traditional retail banking.

PBNA's deposits in the Parkersburg Marietta MA total approximately \$507 million. Based on FDIC deposit market share data as of June 30, 2006, this represents 44 percent of the bank's total deposits and equates to a 20 percent deposit market share that ranks PBNA as the second largest deposit taking institution in the MA. Competitors in the Parkersburg-Marietta MA include, but are not limited to, United National Bank, Wesbanco Bank Inc., Branch Banking and Trust Company, and JPMorgan Chase Bank.

Total bank loans in the AA equal \$118 million and represent 24 percent of total reported loans.

The unemployment rate for Washington County (Marietta) is 5.0 percent, as of December 2005, and is slightly below the Ohio state average of 5.9 percent. The unemployment rate for Wood County (Parkersburg) is 5.4 percent, as of December 2005, and is slightly above the West Virginia state average of 5 percent. Manufacturing, retail trade and services are the major industry trades in the MA.

The 2005 HUD adjusted median family income for the AA is \$48,200. Based on the 2000 census data, 18 percent of the families in the AA are low-income and 19 percent are moderate-income. The 2000 median housing value is \$75,275.

We identified the following credit and non-credit related needs in this AA:

- Financial literacy workshops are needed to understand how to save and manage money to meet present and future needs.
- Limited branch network requires traveling far distances for banking services which discourages LMI individuals to open accounts.
- Create asset development opportunities for low income individuals and offer promotions (matching program for amount deposited) to increase level of new checking accounts opened.

We determined these community needs by contacting representatives from local housing and community service agencies, and small business development organizations.

We determined that the opportunity to make CD loans and qualified investments, and to provide CD services within this AA is moderate. These opportunities include LIHTC projects, non-profit housing organizations, small business development centers, and non-profit organizations that provide social services to low- and moderate-income individuals. Overall, opportunities for partnerships are moderate. Competition for CD loans, qualified investments and CD services is moderate and consists primarily of several other financial institutions that have a presence within the AA.

Huntington-Ashland MA

Demographic Information for Full-Scope Area: Huntington-Ashland MA						
Demographic Characteristics	#	Low % of #	Moderate % of #	Middle % of #	Upper % of #	NA* % of #
Geographies (Census Tracts/BNAs)	49	6.12	20.41	42.86	30.61	0.00
Population by Geography	183,427	2.96	14.10	48.18	34.76	0.00
Owner-Occupied Housing by Geography	53,071	0.19	10.72	51.98	37.11	0.00
Businesses by Geography	11,347	10.74	15.19	42.10	31.96	0.00
Farms by Geography	214	1.87	8.88	54.67	34.58	0.00
Family Distribution by Income Level	51,173	20.57	16.44	20.32	42.67	0.00
Distribution of Low- and Moderate-Income Families throughout AA Geographies	18,938	1.12	20.26	52.70	25.92	0.00
Median Family Income HUD Adjusted Median Family Income for 2005 Households Below the Poverty Level	= \$37,119 = \$44,050 = 18%	Median Housing Value Unemployment Rate (2000 US Census)		= \$68,404 = 5.9%		

(*) The NA category consists of geographies that have not been assigned an income classification.
Source: 2000 U.S. Census and 2005 HUD updated MFI.

The AA consists of the majority of the Huntington-Ashland, WV-KY, MA. This AA meets the requirements of the regulation and does not arbitrarily exclude low- or moderate-income geographies. The Huntington-Ashland MA is a multi-state metropolitan area (MSMA), which includes Cabell County in West Virginia and Boyd and Greenup Counties in Kentucky. The bank's AA includes one geography in Cabell County and all tracts in Boyd and Greenup Counties in Kentucky. Cabell County in West Virginia is located on the northwestern border of West Virginia along the Ohio River and contains the town of Huntington. Boyd and Greenup Counties in Kentucky are located in the Northeast corner of Kentucky and border the Ohio River. The city of Ashland is located in Boyd County. Within the AA there are 3 low-income geographies, 10 moderate-income geographies, 21 middle-income geographies and 15 upper-income geographies.

PBNA has five full service branches and six ATMs in the AA, which conduct traditional banking services. The bank's primary business focus in the AA is traditional retail banking.

PBNA's deposits in the Huntington-Ashland, WV-KY, MSMA total approximately \$154 million. Based on FDIC deposit market share data as of June 30, 2006, this represents 13 percent of the bank's total deposits and equates to a 4.14 percent deposit market share that ranks PBNA as the 10th largest deposit taking institution in the MSMA. Other competitors in the Huntington-Ashland WV-KY MA include City National Bank of West Virginia, JPMorgan Chase Bank NA, Huntington FSB, and National City Bank of

Kentucky. Total bank loans in the AA equal \$55 million and represent 5 percent of total reported bank loans in the AA.

The unemployment rate for Cabell County (Huntington) is 4.4 percent, as of December 2005, and is below the West Virginia state average of 5.0 percent. The unemployment rate for Boyd is 6.6 percent and Greenup is 6.6 percent as of December 2005. Boyd and Greenup Counties are slightly higher than the Kentucky state average of 6.1 percent. In the Huntington MSA the major business industries are manufacturing, trade and services. Federal, State, and local governments are also considered major employers in the area. In Kentucky, the major industry is manufacturing.

The 2005 HUD adjusted median family income for the AA is \$37,119. Based on the 2000 census data, 21 percent of the families in the AA are low-income and 16 percent are moderate-income. Median Housing Value is \$68,404. Eighteen percent of the households in the AA are below poverty level.

We identified the following credit and non-credit related needs in this AA.

- Affordable housing (i.e. single family homeownership, and rehabilitation) for low- and moderate-income individuals. Rental assisted housing and down payment assistance were also identified as needs.
- Small business working capital loans to existing and start up business in amounts of \$25,000 and less. Technical assistance to new and existing businesses was also identified as a need.
- Social services to low- and moderate-income families including child care services, counseling and job training, credit and home ownership counseling, food donation, health care services, and public transportation.
- There is also a great need for additional economic development of the area as one gets further away from the Ohio River. Revitalization of existing commercial areas and development of new areas is a necessity. Infrastructure improvements (roads, water, sewer, etc.) need to be completed in order to expand business areas.

We determined these community needs by contacting representatives from community service agencies and rural business development organizations.

We determined that the opportunity to make CD loans and qualified investments and to provide CD services within this AA is moderate. These opportunities include low-income housing tax credits, non-profit housing organizations, small business development centers, and non-profit organizations that provide social services to low- and moderate-income individuals. Overall, opportunities for partnerships are moderate. Competition for CD loans, qualified investments and CD services is moderate and consists primarily of several other financial institutions that have a presence within the MA.

State of Ohio

Non - MA of Ohio AA

Demographic Information for Full-Scope Area: Non-MA of Ohio AA						
Demographic Characteristics	#	Low % of #	Moderate % of #	Middle % of #	Upper % of #	NA* % of #
Geographies (Census Tracts/BNAs)	53	1.89	33.96	58.49	5.66	0.00
Population by Geography	217,033	1.28	32.59	61.05	5.07	0.00
Owner-Occupied Housing by Geography	59,198	0.12	33.94	61.15	4.79	0.00
Businesses by Geography	11,258	1.18	33.82	59.50	5.51	0.00
Farms by Geography	897	0.00	32.22	64.44	3.34	0.00
Family Distribution by Income Level	55,322	26.09	20.92	22.38	30.61	0.00
Distribution of Low- and Moderate-Income Families throughout AA Geographies	26,005	0.53	40.52	56.37	2.58	0.00
Median Family Income = \$43,614 HUD Adjusted Median Family Income for 2005 = \$50,530 Households Below the Poverty Level = 20%			Median Housing Value = \$69,168 Unemployment Rate (2000 US Census) = 6.61% AVG. rate of all the ohio counties' in this Non-MA.			

(*) The NA category consists of geographies that have not been assigned an income classification.
Source: 2000 U.S. Census, and 2005 HUD updated MFI.

The AA consists of Athens, Gallia, Guernsey, Hocking, Meigs, Morgan, and Noble Counties. This AA meets the requirements of the regulation and does not arbitrarily exclude low- or moderate-income geographies. Gallia and Meigs Counties border the Ohio River in the southeastern part of Ohio. Athens County is adjacent to Meigs County and is home to Ohio University. Morgan, Noble, and Athens Counties are all adjacent to Washington County, which is located in the Marietta-Parkersburg MA. Hocking County is adjacent to Athens County. Within the AA there is one low income geography, 18 moderate-income geographies, 31 middle-income geographies, and three upper-income geographies.

PBNA has 18 full service branches and 13 ATMs in the AA, which conduct traditional banking services.

PBNAs deposits in the Non-MA of Ohio AA total approximately \$317 million. Based on FDIC deposit market share data as of June 30, 2006, this represents 27 percent of the banks total deposits and equates to a 13.84 percent deposit market share that continues to rank PBNA as the second largest deposit taking institution in the AA. Other competitors in the assessment area include, but are not limited to Ohio Valley Bank Company, Advantage Bank, National City Bank, JP Morgan Chase Bank, NA; and US Bank National Association.

Total bank loans in the AA equal approximately \$ 104 million and represent 16.9 percent of all total reported bank loans in the AAs.

The December 31, 2005 unemployment rates for the counties are as follows: Athens 5.0 percent, Gallia 6.5 percent, Guernsey 5.9 percent, Hocking 7.5 percent, Meigs 7.6 percent, Morgan 7.2 percent, and Noble 6.6 percent. All county rates range above the 2005 state average (5.9 percent) except for Athens and Guernsey Counties. The lower unemployment rate in Athens County is attributed to the employment opportunities at and around Ohio University. Ohio University is still the largest employer in the area. Retail trade and services are the second and third largest employment industries in the area. In Morgan and Meigs Counties the loss of several major industries in the last few years continues to impact the areas' unemployment conditions. While migration appears to have stopped, the lack of higher paying jobs in Meigs County has forced many citizens to drive to the Lancaster area for work. Everyone in the AA counties is more dependent on small businesses than they have been in the past. While new retail stores have opened and created more jobs throughout these counties, the jobs are usually "low pay" jobs. The population rate has risen only slightly since the 1990 census in all the Non MA of Ohio AA counties.

The 2005 HUD adjusted median family income for the AA is \$50,530. Based on the 2000 census data, 26.09 percent of the families in the AA are low-income, 20.92 percent are moderate-income, 22.38 percent are middle-income level, and 30.61 are upper income level. Median Housing Value is \$69,168. Twenty percent of the households in the AA are below poverty level.

We identified the following credit and non-credit related needs in this AA.

- Banks could implement "Individual Development Account" (IDA) Programs for LMI income individuals. Through these programs, the bank's matching funds would give incentive for better planning to the customers who are working and trying to save money. Under the program, the customers would only be allowed to withdraw the funds for specific purposes, such as buying a new home or for education.
- Banks could offer incentives, such as a "one time deposit" (\$25 / \$50), to encourage LMI individuals to open a new checking account.
- The citizens in many of these AA communities have not given proper consideration to retirement savings programs. There is a need for retirement and planning programs that could be made available to these people for improving their retirement planning skills.

We determined these community needs by contacting representatives from local housing and community service agencies, and small business development organizations.

State of West Virginia

Non-MA of West Virginia AA

Demographic Information for Full-Scope Area: Non-MA of West Virginia AA						
Demographic Characteristics	#	Low % of #	Moderate % of #	Middle % of #	Upper % of #	NA* % of #
Geographies (Census Tracts / BNAs)	9	0.00	0.00	77.78	22.22	0.00
Population by Geography	43,650	0.00	0.00	82.77	17.23	0.00
Owner-Occupied Housing by Geography	14,189	0.00	0.00	82.70	17.30	0.00
Businesses by Geography	1,804	0.00	0.00	80.99	19.01	0.00
Farms by Geography	87	0.00	0.00	95.40	4.60	0.00
Family Distribution by Income Level	12,782	20.70	16.53	19.12	43.65	0.00
Distribution of Low- and Moderate-Income Families throughout AA Geographies	4,759	0.00	0.00	86.09	13.91	0.00
Median Family Income = \$32,500		Median Housing Value = \$59,393				
HUD Adjusted Median Family Income for 2005 = \$39,400		Unemployment Rate = 8.45%				
Households Below the Poverty Level = 20%						

(*) The NA category consists of geographies that have not been assigned an income classification.
 Source: 2000 U.S. Census, and 2005 HUD updated MFI.

The AA consists of Mason and Wetzel counties in West Virginia. Within the AA there are no low-income or moderate-income geographies. Middle-income and Upper-income levels comprise 7 and 2 geographies respectively in the AA. Wetzel County is located in the northwestern border of the state and Mason County is on the mid-western border of the state. Both counties border the Ohio River.

PBNA has five full service branches and four ATMs in the AA, which provide traditional banking services. The bank’s primary business focus in the assessment area is traditional retail banking.

PBNA’s deposits in the Non-MA of West Virginia AA total approximately \$145 million. Based on FDIC deposit market share data as of June 30, 2006, this represents 12.50 percent of the bank’s total deposits and equates to a 28 percent market share that ranks PBNA as the largest deposit taking institution in the AA. Other competitors in the assessment area include, but are not limited to Ohio Valley Bank Company, Wesbanco, City National Bank of West Virginia, and Branch Banking and Trust Company.

Total bank loans in the AA equal \$9.7 million and represent 2.97 percent of all total reported bank loans in the AAs.

The unemployment rates for the counties are: Mason County 7.7 percent and Wetzel County 9.2 percent as of December 31, 2005. Both county rates are significantly above the 2005 West Virginia State average of 5.0 percent. The loss of several major industries, mining, and manufacturing in the last few years has increased unemployment. Service and retail trades are now considered the largest employer industry trades in the area. Neither of the counties in this AA have experienced population growth. Since the 1990 Census, Mason county has remained steady, while the population in Wetzel county has declined.

The 2005 HUD adjusted median family income for the AA is \$39,400. Based on the 2000 census data, there are no low-income or moderate income geographies in the AA. Middle income and upper income comprise 78.78 percent and 22.22 percent respectively of the geographies in the AA. Median Housing Value is \$59,393. Twenty percent of the households in the AA are below poverty level.

We identified the following credit needs in this AA.

- Small business loans that would create jobs and
- affordable housing loans are the primary credit needs in this area that has experienced large job losses due to layoffs from a major employer.

We determined these community needs by contacting a representative from a local community service agency.

State of Kentucky

Non-MA of Kentucky AA

Demographic Information for Full-Scope Area: Non-MA of Kentucky AA						
Demographic Characteristics	#	Low % of #	Moderate % of #	Middle % of #	Upper % of #	NA* % of #
Geographies (Census Tracts / BNAs)	7	0.00	0.00	100.00	0.00	0.00
Population by Geography	26,889	0.00	0.00	100.00	0.00	0.00
Owner-Occupied Housing by Geography	8,373	0.00	0.00	100.00	0.00	0.00
Businesses by Geography	1,356	0.00	0.00	100.00	0.00	0.00
Farms by Geography	48	0.00	0.00	100.00	0.00	0.00
Family Distribution by Income Level	7,770	25.42	16.10	20.40	38.08	0.00
Distribution of Low- and Moderate-Income Families throughout AA Geographies	3,226	0.00	0.00	100.00	0.00	0.00
Median Family Income = \$32,884		Median Housing Value = \$48,343				
HUD Adjusted Median Family Income for 2005 = \$38,400		Unemployment Rate (12/31/05) = 9.10%				
Households Below the Poverty Level = 22%						

(*) The NA category consists of geographies that have not been assigned an income classification.
 Source: 2000 U.S. Census, and 2005HUD updated MFI.

The AA consists of only one county in Kentucky, Carter County. This AA meets the requirements of the regulation and does not arbitrarily exclude low- and moderate-income geographies. The realignment of MA's by the Census Bureau in 2004 moved Carter County, Kentucky out of the Huntington / Ashland MSA #26580. When Carter County was removed from the Huntington/Ashland MSA, it created the need for a KY Non-MA Assessment Area that included only Carter County. Within the AA there are no low-income, moderate-income, or upper income geographies. Carter County is located in the Northeastern sector of the state.

As a result of the Kentucky Bancshares Acquisition, effective May 9, 2003; PBNA has one full service branch and no proprietary ATMs in the AA. PBNA's management has agreed to waive its fees for any of its customers' transactions completed through a local ATM, which is located at First National Bank. First National Bank is in PBNA's Non-MA of Kentucky AA. PBNA's primary business focus in the assessment area is traditional retail banking.

PBNAs deposits in the Non-MA of Kentucky AA total approximately \$15 Million. Based on FDIC deposit market share data as of June 30, 2006, this represents 1 percent of the banks total deposits and equates to a 4.89 percent market share that ranks PBNA as the third largest deposit taking institution in the AA. Other competitors in the assessment

area include First NB of Grayson, Commercial Bank of Grayson, City NB of West Virginia, and Citizens NB of Paintsville.

Total bank loans in the AA equal approximately \$3 million and represent 0.46 percent of all total reported bank loans in the AAs.

Carter County had an unemployment rate of 9.10 percent as of December 31, 2005, which is significantly above the Kentucky State annual average of 6.1 percent. The population trend shows a steady rise in population since the 1990 census with a definite slowing of the rise since the 2000 census. The loss of several major industries, mining and manufacturing, in the last few years has increased unemployment. Service and retail trades are now considered the largest employer industry trades in the area.

The 2005 HUD adjusted median family income for the AA is \$38,400. Based on the 2000 census data, 25.42 percent of the families in the AA are low-income, 16.10 percent are moderate-income, 20.40 percent are middle income, and 38.08 percent are upper income. Median Housing Value is \$48,343. Twenty-two percent of the households in the AA are below poverty level with a per capita personal income of only \$17,733.

We identified the following credit and non-credit related needs in this AA.

Small business loans that would create jobs are the major credit need of this area. There are few job opportunities in this area now. The major employer is a medical center.

We determined these community needs by contacting a representative from a local community service agency

Appendix D: Tables of Performance Data

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Content of Standardized 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: 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. Deposit data are compiled by the FDIC and are available as of June 30th 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. Refer to Interagency Q&As __.12(i) - 5 and - 6 for guidance on when a bank may receive positive CRA consideration for such loans. When such loans exist, insert a line item with the appropriate caption, such as “Statewide/Regional” or “Out of Assessment Area,” in the MA/Assessment Area column and record the corresponding numbers and amounts in the “Community Development Loans” column.
- 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 and 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. When such

investments exist, insert a line item with the appropriate caption, such as “Statewide/Regional” or “Out of Assessment Area,” in the MA/Assessment Area column and record the corresponding numbers and amounts in the “Qualified Investments” column.

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.

Institution ID: Peoples Bank

Table 1. Lending Volume

LENDING VOLUME												
Geography: OH-KY-WV Evaluation Period: JANUARY 1, 2004 TO DECEMBER 31, 2005												
MA/Assessment Area	% 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)	
Full Review:												
Huntington-Ashland MSMA WV-KY- WV-KY-OH	100	245	26,249	178	29,000	0	0	5	4,500	427	59,749	100
State of Kentucky Non-MA	100	31	2,345	7	670	0	0	0	0	38	3,015	100
State of Ohio Non-MA	87.20	1,053	71,001	353	33,217	0	0	25	7,200	1,431	111,418	92
Parkersburg-Marietta MSM 37620	100	1,025	87,270	272	30,853	0	0	2	10,000	1,299	128,123	100
State of West Virginia Non-	100	171	7,606	33	2,109	0	0	2	811	204	9,715	100
Limited Review:												
Columbus MA 18140	12.80	81	12,581	129	24,611	0	0	0	0	210	37,192	8

* Loan Data as of December 31, 2005. Rated area refers to either state or multi-state MA rating area.

** The evaluation period for Community Development Loans is from June 04, 2002 to October 23, 2006.

*** Deposit Data as of June 30, 2006. Rated Area refers to either the state, multi-state MA, or institution, as appropriate.

Institution ID: Peoples Bank

Table2. Geographic Distribution of Home Purchase Loans

Geographic Distribution: HOME PURCHASE		Geography: OH-KY-WV Evaluation Period: JANUARY 1, 2004 TO DECEMBER 31, 2005													
MA/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	Overa ll	Low	Mod	Mid	Upp
Full Review:															
Huntington-Ashland MA 26580 WV-KY-OH	109	9.43	0.19	0.00	10.72	11.01	51.98	54.13	37.11	34.86	0.99	0.00	0.87	1.15	0.86
Kentucky Non-MA	11	0.95	0.00	0.00	0.00	0.00	100.00	100.00	0.00	0.00	1.15	0.00	0.00	1.15	0.00
Ohio-Non-MA	467	40.40	0.12	0.43	33.94	44.11	61.15	51.39	4.79	4.07	8.11	0.00	10.52	7.54	3.93
Parkersburg-Marietta MA 37620	453	39.19	0.00	0.00	9.25	11.48	77.02	77.04	13.73	11.48	8.18	0.00	9.32	8.24	6.94
West Virginia Non-MA	73	6.31	0.00	0.00	0.00	0.00	82.70	83.56	17.30	16.44	8.35	0.00	0.00	9.14	4.94
Limited Review:															
Columbus MA 18140	43	3.72	0.00	0.00	20.31	48.84	49.57	41.86	30.11	9.30	0.26	0.00	1.01	0.17	0.06

* Based on 2005 Peer Mortgage Data (Eastern)

** 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 2000 Census information.

**** Data shown includes only One to Four-family and manufactured housing. (Property type of 1 or 2)

Institution ID: Peoples Bank

Table 3. Geographic Distribution of Home Improvement Loans

Geographic Distribution: HOME IMPROVEMENT 2005			Geography: OH-KY-WV				Evaluation Period: JANUARY 1, 2004 TO DECEMBER 31, 2005					Market Share (%) by Geography*				
MA/Assessment Area:	Total Home Improvement Loans		Low-Income Geographies		Moderate-Income Geographies		Middle-Income Geographies		Upper-Income Geographies		Over all	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						
Full Review:																
Huntington-Ashland MA 26580 WV-KY-OH	28	6.67	0.19	0.00	10.72	10.71	51.98	53.57	37.11	35.71	2.36	0.00	3.13	2.36	2.17	
Kentucky Non-MA	9	2.14	0.00	0.00	0.00	0.00	100.00	100.00	0.00	0.00	5.26	0.00	0.00	5.26	0.00	
Ohio-Non-MA	203	48.33	0.12	0.00	33.94	42.36	61.15	56.16	4.79	1.48	14.49	0.00	17.90	12.64	20.00	
Parkersburg-Marietta MA 37620	128	30.48	0.00	0.00	9.25	7.81	77.02	85.94	13.73	6.25	11.38	0.00	8.47	12.78	4.48	
West Virginia Non-MA	46	10.95	0.00	0.00	0.00	0.00	82.70	76.09	17.30	23.91	15.85	0.00	0.00	16.42	13.33	
Limited Review:																
Columbus MA 18140	6	1.43	0.00	0.00	20.31	16.67	49.57	66.67	30.11	16.67	0.18	0.00	0.84	0.00	0.00	

* Based on 2005 Peer Mortgage Data (Eastern)

** 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 2000 Census information.

**** Data shown includes only One to Four-family and manufactured housing. (Property type of 1 or 2)

Institution ID: Peoples Bank

Table 4. Geographic Distribution of Home Mortgage Refinance Loans

Geographic Distribution: HOME MORTGAGE REFINANCE 31, 2005			Geography: OH-KY-WV						Evaluation Period: JANUARY 1, 2004 TO DECEMBER						
MA/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	Overa ll	Low	Mod	Mid	Upp
Full Review:															
Huntington-Ashland MA 26580 WV-KY-OH	104	10.24	0.19	0.00	10.72	5.77	51.98	55.77	37.11	38.46	1.43	0.00	1.95	1.58	1.12
Kentucky Non-MA	11	1.08	0.00	0.00	0.00	0.00	100.00	100.00	0.00	0.00	2.24	0.00	0.00	2.24	0.00
Ohio-Non-MA	379	37.30	0.12	0.00	33.94	42.48	61.15	54.62	4.79	2.90	6.12	0.00	8.17	5.25	4.90
Parkersburg-Marietta MA 37620	441	43.41	0.00	0.00	9.25	4.76	77.02	83.22	13.73	12.02	7.05	0.00	4.63	7.47	6.30
West Virginia Non-MA	52	5.12	0.00	0.00	0.00	0.00	82.70	90.38	17.30	9.62	5.45	0.00	0.00	6.04	1.85
Limited Review:															
Columbus MA 18140	29	2.85	0.00	0.00	20.31	27.59	49.57	62.07	30.11	10.34	0.17	0.00	0.15	0.30	0.00

* Based on 2005 Peer Mortgage Data (Eastern)

** 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 2000 Census information.

**** Data shown includes only One to Four-family and manufactured housing. (Property type of 1 or 2)

Institution ID: Peoples Bank

Table 5. Geographic Distribution of Multifamily Loans

Geographic Distribution: MULTIFAMILY			Geography: OH-KY-WV				Evaluation Period: JANUARY 1, 2004 TO DECEMBER 31, 2005					Market Share (%) by Geography*				
MA/Assessment Area:	Total Multifamily Loans		Low-Income Geographies		Moderate-Income Geographies		Middle-Income Geographies		Upper-Income Geographies		Overall	Low	Mod	Mid	Upp	
	#	% of Total**	% of MF Units***	% BANK Loans*** *	% MF Units***	% BANK Loans	% MF Units***	% BANK Loans	% MF Units***	% BANK Loans						
Full Review:																
Huntington-Ashland MA 26580 WV-KY-OH	4	28.57	18.38	0.00	28.36	25.00	24.56	50.00	28.70	25.00	7.50	0.00	11.11	11.11	7.69	
Kentucky Non-MA	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	
Ohio-Non-MA	4	28.57	13.26	0.00	27.80	0.00	46.09	100.00	12.86	0.00	0.00	0.00	0.00	0.00	0.00	
Parkersburg-Marietta MA 37620	3	21.43	0.00	0.00	29.94	0.00	63.22	100.00	6.84	0.00	15.38	0.00	0.00	22.22	0.00	
West Virginia Non-MA	0	0.00	0.00	0.00	0.00	0.00	84.76	0.00	15.24	0.00	0.00	0.00	0.00	0.00	0.00	
Limited Review:																
Columbus MA 18140	3	21.43	0.00	0.00	44.41	66.67	44.75	33.33	10.84	0.00	10.00	0.00	0.00	20.00	0.00	

* Based on 2005 Peer Mortgage Data (Eastern)

** Multi-family loans originated and purchased in the MA/AA as a percentage of all multi-family loans originated and purchased in the rated area.

*** Percentage of Multi Family Units is the number of multi family units in a particular geography divided by the number of multifamily housing units in the area based on 2000 Census information.

**** Multifamily loan distribution includes Home Purchases, Home Improvement and Refinances.

Institution ID: Peoples Bank

Table 6. Geographic Distribution of Small Loans to Businesses

Geographic Distribution: SMALL LOANS TO BUSINESSES 31, 2005			Geography: OH-KY-WV						Evaluation Period: JANUARY 1, 2004 TO DECEMBER						
MA/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 Business ses***	% BANK Loans	% of Business ses***	% BANK Loans	% of Business ses***	% BANK Loans	% of Business ses***	% BANK Loans	Overall	Low	Mod	Mid	Upp
Full Review:															
Huntington-Ashland MA 26580 WV-KY-OH	178	18.31	10.74	5.06	15.19	20.79	42.10	34.27	31.96	39.89	2.51	1.01	2.06	2.20	3.62
Kentucky Non-MA	7	0.72	0.00	0.00	0.00	0.00	100.00	100.00	0.00	0.00	1.31	0.00	0.00	1.41	0.00
Ohio-Non-MA	353	36.32	1.18	0.85	33.82	44.48	59.50	49.01	5.51	5.67	3.55	2.63	6.11	2.87	2.17
Parkersburg-Marietta MA 37620	272	27.98	0.00	0.00	30.25	28.68	60.65	62.50	9.10	8.82	3.57	0.00	3.42	4.10	2.35
West Virginia Non-MA	33	3.40	0.00	0.00	0.00	0.00	80.99	96.97	19.01	3.03	3.49	0.00	0.00	4.79	0.00
Limited Review:															
Columbus MA 18140	129	13.27	0.00	0.00	28.51	31.78	42.85	51.16	28.65	17.05	2.06	0.00	2.83	2.69	1.16

* Based on 2005 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 (2005).

Institution ID: Peoples Bank

Table 7. Geographic Distribution of Small Loans to Farms

Geographic Distribution: SMALL LOANS TO FARMS DECEMBER 31, 2005		Geography: OH-KY-WV						Evaluation Period: JANUARY 1, 2004 TO							
MA/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	Overa ll	Low	Mod	Mid	Upp
Full Review:															
Huntington-Ashland MA 26580 WV-KY-OH	0	0.00	1.87	0.00	8.88	0.00	54.67	0.00	34.58	0.00	0.00	0.00	0.00	0.00	0.00
Kentucky Non-MA	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
Ohio-Non-MA	0	0.00	0.00	0.00	32.22	0.00	64.44	0.00	3.34	0.00	0.00	0.00	0.00	0.00	0.00
Parkersburg-Marietta MA 37620	0	0.00	0.00	0.00	10.86	0.00	73.48	0.00	15.65	0.00	0.00	0.00	0.00	0.00	0.00
West Virginia Non-MA	0	0.00	0.00	0.00	0.00	0.00	95.40	0.00	4.60	0.00	0.00	0.00	0.00	0.00	0.00
Limited Review:															
Columbus MA 18140	0	0.00	0.00	0.00	9.58	0.00	64.38	0.00	26.04	0.00	0.00	0.00	0.00	0.00	0.00

* Based on 2005 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 (2005).

Institution ID: Peoples Bank

Table 8. Borrower Distribution of Home Purchase Loans

Borrower Distribution: HOME PURCHASE		Geography: OH-KY-WV						Evaluation Period: JANUARY 1, 2004 TO DECEMBER 31, 2005							
MA/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 ⁶	% BANK Loans**	% Families***	% BANK Loans****	% Families**	% BANK Loans****	Overall	Low	Mod	Mid	Upp
Full Review:															
Huntington-Ashland MA 26580 WV-KY-OH	109	9.43	20.57	10.23	16.44	25.00	20.32	20.45	42.67	44.32	1.08	0.00	1.92	0.57	1.20
Kentucky Non-MA	11	0.95	25.42	9.09	16.10	18.18	20.40	18.18	38.08	54.55	1.47	0.00	0.00	1.75	2.20
Ohio-Non-MA	467	40.40	26.09	18.22	20.92	22.78	22.38	29.38	30.61	29.61	9.38	18.67	9.35	8.12	7.01
Parkersburg-Marietta MA 37620	453	39.19	18.47	11.08	19.09	27.47	21.88	26.51	40.57	34.94	8.13	8.90	9.13	9.30	6.69
West Virginia Non-MA	73	6.31	20.70	11.76	16.53	35.29	19.12	25.00	43.65	27.94	8.09	13.79	15.71	5.88	5.49
Limited Review:															
Columbus MA 18140	43	3.72	16.71	0.00	20.20	20.00	24.02	48.57	39.07	31.43	0.22	0.00	0.42	0.37	0.00

* Based on 2005 Peer Mortgage Data (Eastern)

** As a percentage of loans with borrower income information available. No information was available for 8.7% of loans originated and purchased by bank.

*** Percentage of Families is based on the 2000 Census information.

**** 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.

6 Data shown includes only One to Four-family and manufactured housing. (Property type of 1 or 2)

Institution ID: Peoples Bank

Table 9. Borrower Distribution of Home Improvement Loans

Borrower Distribution: HOME IMPROVEMENT 31, 2005		Geography: OH-KY-WV						Evaluation Period: JANUARY 1, 2004 TO DECEMBER 31, 2005							
MA/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 ⁷	% BANK Loans****	% Families**	% BANK Loans****	% Families**	% BANK Loans****	Overall	Low	Mod	Mid	Upp
Full Review:															
Huntington-Ashland MA 26580 WV-KY-OH	28	6.67	20.57	11.54	16.44	19.23	20.32	23.08	42.67	46.15	2.41	3.85	1.67	2.58	2.25
Kentucky Non-MA	9	2.14	25.42	33.33	16.10	11.11	20.40	22.22	38.08	33.33	5.26	0.00	11.11	0.00	5.56
Ohio-Non-MA	203	48.33	26.09	27.18	20.92	26.67	22.38	27.18	30.61	18.97	13.89	24.19	12.11	15.98	7.46
Parkersburg-Marietta MA 37620	128	30.48	18.47	26.23	19.09	27.87	21.88	22.13	40.57	23.77	11.13	17.92	11.56	9.84	7.85
West Virginia Non-MA	46	10.95	20.70	8.70	16.53	34.78	19.12	28.26	43.65	28.26	15.95	6.67	28.95	21.62	8.62
Limited Review:															
Columbus MA 18140	6	1.43	16.71	0.00	20.20	20.00	24.02	60.00	39.07	20.00	0.00	0.00	0.00	0.00	0.00

* Based on 2005 Peer Mortgage Data (Eastern)

** As a percentage of loans with borrower income information available. No information was available for 4.0% of loans originated and purchased by bank.

*** Percentage of Families is based on the 2000 Census information.

**** 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.

⁷ Data shown includes only One to Four-family and manufactured housing. (Property type of 1 or 2)

Institution ID: Peoples Bank

Table 10. Borrower Distribution of Home Mortgage Refinance Loans

Borrower Distribution: HOME MORTGAGE REFINANCE 31, 2005		Geography: OH-KY-WV						Evaluation Period: JANUARY 1, 2004 TO DECEMBER							
MA/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 ⁸	% BANK Loans****	% Families**	% BANK Loans****	% Families*	% BANK Loans**	Overa ll	Low	Mod	Mid	Upp
Full Review:															
Huntington-Ashland MA 26580 WV-KY-OH	104	10.24	20.57	13.41	16.44	18.29	20.32	26.83	42.67	41.46	1.49	3.52	0.90	1.89	1.20
Kentucky Non-MA	11	1.08	25.42	0.00	16.10	11.11	20.40	22.22	38.08	66.67	2.60	0.00	0.00	3.51	2.97
Ohio-Non-MA	379	37.30	26.09	11.51	20.92	27.40	22.38	30.41	30.61	30.68	6.73	8.73	7.18	6.58	5.84
Parkersburg-Marietta MA 37620	441	43.41	18.47	11.58	19.09	23.15	21.88	26.35	40.57	38.92	7.40	7.39	8.58	6.63	7.31
West Virginia Non-MA	52	5.12	20.70	13.73	16.53	11.76	19.12	27.45	43.65	47.06	5.75	18.18	4.26	5.68	3.89
Limited Review:															
Columbus MA 18140	29	2.85	16.71	12.50	20.20	16.67	24.02	25.00	39.07	45.83	0.15	0.63	0.13	0.00	0.17

* Based on 2005 Peer Mortgage Data (Eastern)

** As a percentage of loans with borrower income information available. No information was available for 7.8% of loans originated and purchased by bank.

*** Percentage of Families is based on the 2000 Census information.

**** 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.

⁸ Data shown includes only One to Four-family and manufactured housing. (Property type of 1 or 2)

Institution ID: Peoples Bank

Table11. Borrower Distribution of Small Loans to Businesses

Borrower Distribution: SMALL LOANS TO BUSINESSES 31, 2005		Geography: OH-KY-WV			Evaluation Period: JANUARY 1, 2004 TO DECEMBER				
MA/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
Full Review:									
Huntington-Ashland MA 26580 WV-KY-OH	178	18.31	60.27	56.18	48.31	33.15	18.54	2.51	2.36
Kentucky Non-MA	7	0.72	58.11	85.71	71.43	28.57	0.00	1.31	2.08
Ohio-Non-MA	353	36.32	62.05	73.09	75.07	16.15	8.78	3.55	5.77
Parkersburg-Marietta MA 37620	272	27.98	60.40	65.81	67.28	19.12	13.60	3.57	4.55
West Virginia Non-MA	33	3.40	57.32	90.91	90.91	0.00	9.09	3.49	6.83
Limited Review:									
Columbus MA 18140	129	13.27	66.66	55.04	48.84	27.13	24.03	2.06	2.08

* Based on 2005 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 - 2005).

**** 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 7.51% of small loans to businesses originated and purchased by the bank.

Institution ID: Peoples Bank

Table12. Borrower Distribution of Small Loans to Farms

Borrower Distribution: SMALL LOANS TO FARMS									
Geography: OH-KY-WV				Evaluation Period: JANUARY 1, 2004 TO DECEMBER 31, 2005					
MA/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 \$1,000,000	All	Rev\$ 1 Million or Less
Full Review:									
Huntington-Ashland MA 26580 WV-KY-OH	0	0.00	91.59	0.00	0.00	0.00	0.00	0.00	0.00
Kentucky Non-MA	0	0.00	97.92	0.00	0.00	0.00	0.00	0.00	0.00
Ohio-Non-MA	0	0.00	95.54	0.00	0.00	0.00	0.00	0.00	0.00
Parkersburg-Marietta MA 37620	0	0.00	96.49	0.00	0.00	0.00	0.00	0.00	0.00
West Virginia Non-MA	0	0.00	96.55	0.00	0.00	0.00	0.00	0.00	0.00
Limited Review:									
Columbus MA 18140	0	0.00	94.58	0.00	0.00	0.00	0.00	0.00	0.00

* Based on 2005 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 - 2005).

**** 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.

Institution ID: Peoples Bank

Table 14. Qualified Investments

QUALIFIED INVESTMENTS		Geography: OH-KY-WV				Evaluation Period: June 2, 2002 TO October 23, 2006			
MA/Assessment Area:	Prior Period Investments*		Current Period Investments		Total Investments			Unfunded Commitments**	
	#	\$(000's)	#	\$(000's)	#	\$(000's)	% of Total	#	\$(000's)
Full Review:									
Huntington-Ashland MA 26580 WV-KY-OH	0	0	78	844	78	844	11	0	0
Kentucky Non-MA	0	0	14	55	14	55	1	0	0
Ohio-Non-MA	0	0	164	1,900	164	1,900	26	0	0
Parkersburg-Marietta MA 37620	2	1,418	122	2,800	124	4,218,	58	0	0
West Virginia Non-MA	0	0	71	308	71	308	4	0	0
Limited Review:									
Columbus MA 18140	0	0	0	0	0	0	0	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.

Institution ID: Peoples Bank

Table 15. Distribution of Branch Delivery System and Branch Openings/Closings

DISTRIBUTION OF BRANCH DELIVERY SYSTEM AND BRANCH OPENINGS/CLOSINGS Geography: OH-KY-WV Evaluation Period: June 2, 2002 TO October 23, 2006																	
MA/Assessment Area:	Deposits % of Rated Area Deposits in AA	Branches						Branch Openings/Closings						Population			
		# 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
Full Review:																	
Huntington-Ashland MA 26580 WV-KY-OH	13.25	5	10.87	0.00	20.00	40.00	40.00	1	1	0	0	0	0	2.96	14.10	48.18	34.76
Kentucky Non-MA	1.28	1	2.17	0.00	0.00	100.00	0.00	0	0	0	0	0	0	0.00	0.00	100.00	0.00
Ohio-Non-MA	27.36	18	39.13	0.00	66.67	33.33	0.00	0	1	0	- 1	0	0	1.28	32.59	61.05	5.07
Parkersburg-Marietta MA 37620	43.91	13	28.26	0.00	30.77	69.23	0.00	0	0	0	0	0	0	0.00	12.42	75.34	12.25
West Virginia Non-MA	12.47	5	10.87	0.00	0.00	80.00	20.00	0	0	0	0	0	0	0.00	0.00	82.77	17.23
Limited Review:																	
Columbus MA 18140	1.71	4	8.70	0.00	50.00	50.00	0.00	1	0	0	1	0	0	0.00	23.36	48.81	27.83