



SMALL BANK

Comptroller of the Currency
Administrator of National Banks

Washington, DC 20219

PUBLIC DISCLOSURE

February 21, 2012

COMMUNITY REINVESTMENT ACT PERFORMANCE EVALUATION

Progressive Bank, National Association
Charter Number: 16248

590 National Road
Wheeling, WV 26003

Office of the Comptroller of the Currency

Western Pennsylvania (Pittsburgh) Field Office
4075 Monroeville Boulevard Building 2, Suite 300
Monroeville, PA 15146

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

INSTITUTION'S CRA RATING: This institution is rated Satisfactory.

The Lending Test is rated: Satisfactory.

The major factors that support this rating include:

- Progressive Bank, National Association (PBNA)'s record of originating loans is reasonable as evidenced by its loan-to-deposit ratio as compared to the average loan-to-deposit ratio of its custom peer group.
- PBNA originated a substantial majority of its residential real estate and small business loans within its combined assessment areas (AAs).
- PBNA's record of originating residential real estate and small business loans reflects reasonable dispersion among AA geographies.
- PBNA's record of originating residential real estate and small business loans reflects reasonable penetration among borrowers of different income levels and businesses of different sizes.

Scope of Examination

We conducted an examination of PBNA for the purpose of evaluating its performance relative to the Community Reinvestment Act (CRA). The scope of the CRA examination included a review of PBNA's record of originating its primary loan products.

PBNA's primary loan products consist of residential mortgage and small business loans. PBNA's record of originating residential mortgage and small business loans was evaluated over the period between January 1, 2009 and December 31, 2011. The evaluation period relative to PBNA's lending performance represents the prior three years. Residential mortgage lending includes home purchase, home improvement, and home mortgage refinance loans.

In order to evaluate PBNA's record of originating residential mortgage loans, we analyzed loan data PBNA collected and reported in accordance with Home Mortgage Disclosure Act (HMDA) requirements.

In order to evaluate PBNA's record of originating small business loans, we collected data from a random sample of small business loans originated by PBNA during the evaluation period described above. The sample of business loans was expanded to ensure that data was collected and analyzed from a minimum number of loans from each AA. The minimum number of loans from which data was collected from each AA was equal to the lesser of either twenty loans or the total number of loans originated within an individual AA during the period.

Description of Institution

PBNA is an independent interstate community bank. PBNA is a wholly owned subsidiary of First West Virginia Bancorp, Inc. Both the holding company and PBNA's headquarters and main office are located in Wheeling, West Virginia, which is situated in Ohio County in the northeastern panhandle of West Virginia. Ohio County is located approximately 50 miles southwest of Pittsburgh, Pennsylvania.

As of December 31, 2011, PBNA's assets totaled \$293 million, deposits totaled \$239 million and tier one capital totaled \$29 million. Net loans and leases totaled \$107 million, representing 36% of total assets. Assets included investments of \$165 million, real estate loans of \$87 million, commercial loans of \$16 million, and individual loans of \$7 million. The remainder of PBNA's asset mix consisted of other loans. PBNA's loan portfolio included residential (1-4 family) mortgage loans, commercial mortgage loans and commercial and industrial loans which represented 27.1%, 49.7%, and 5.1% respectively of PBNA's lending. Municipal, individual, and multifamily loans comprise the majority of the remainder of PBNA's loan portfolio. Since residential mortgage and small business loans represent significant portions of PBNA's loan portfolio, they are considered to be PBNA's primary loan products. PBNA's strategy is to continue to originate residential mortgage and business loans in its market area.

PBNA operates its branch network in seven counties across two states. The counties which house PBNA branches include: Brooke, Upshur, Marshall, Wetzel, Lewis and Ohio Counties in West Virginia and Belmont County in Ohio. PBNA operates nine full service branch offices. During the evaluation period, no new branch offices were opened or no facilities were closed within PBNA's AAs. Two of the branches, Bellaire and Moundsville, are located within moderate-income tracts and two other branches, Buckhannon and Weston, are located within distressed middle-income tracts. Automated teller machines are located in conjunction with each of PBNA's nine branch office locations. As of the first quarter 2012, all ATMs offer only withdrawals and inquiries. However, all locations have deposit capability with night deposit drop units.

PBNA offers a variety of deposit products to meet consumer and commercial banking needs. The bank's internet website provides accessibility to transaction services such as bill paying, loan paying, account transfers and account activity viewing. PBNA offers a variety of checking account products. One of the products is a no minimum balance, no monthly service fee checking account. PBNA maintains a twenty-four hour telephone banking system, providing customers with the ability to obtain loan and deposit account balance information, verify transactions, and transfer funds between accounts.

There are no factors, legal or otherwise, which would hinder PBNA's ability to help meet the credit needs of its AA's. PBNA's last Performance Evaluation (PE) was dated September 10, 2007 and the overall CRA rating assigned was "Satisfactory."

Selection of Areas for Full-Scope Review

PBNA operates branch offices within two multi-state Metropolitan Statistical Areas (MSAs) as well as within three counties in West Virginia which are not located within MSAs. The two multi-state MSAs in which PBNA operates branch offices are the Wheeling, West Virginia-Ohio MSA and the Weirton-Steubenville, West Virginia-Ohio MSA. The Wheeling, WV-OH multi-state MSA consists of Marshall and Ohio Counties in West Virginia and Belmont County in Ohio. The Weirton-Steubenville, WV-OH multi-state MSA consists of Brooke and Hancock Counties in West Virginia and Jefferson County in Ohio.

Within the Weirton-Steubenville, WV-OH multi-state MSA, PBNA operates one branch office in Brooke County, West Virginia. The total population of the three-county, Weirton-Steubenville, WV-OH multi-state MSA is less than 250,000, totaling just 132,000 residents as of the 2000 census (though a July 1, 2009 estimate placed the population at 120,929). Additionally, within its Weirton-Steubenville MSA, PBNA only operates branch offices in West Virginia. Therefore, we did not evaluate PBNA's performance in the Weirton-Steubenville, WV-OH MSA separately for the purpose of assigning a separate multi-state MSA rating. Rather, we evaluated PBNA's performance in Brooke County, West Virginia in combination with PBNA's performance in its non-MSA West Virginia counties for the purposes of assigning a West Virginia state rating.

PBNA has designated four separate AAs, but we combined two of the AAs for the purpose of our review. PBNA's AAs are comprised of seventy-two (72) geographies consisting of seven whole West Virginia and Ohio counties in their entirety. The geographies are located within Belmont County, Ohio and Marshall, Brooke, Lewis, Upshur, Wetzel and Ohio Counties in West Virginia. Marshall and Ohio Counties in West Virginia and Belmont County in Ohio comprise the Wheeling, WV-OH multi-state MSA. (Wheeling, West Virginia/Ohio MSA AA)

PBNA designated adjacent Lewis and Upshur Counties in West Virginia as one AA and non-adjacent Wetzel County, West Virginia as another AA. Lewis, Upshur and Wetzel Counties in West Virginia are all West Virginia non-MSA counties. Therefore, we combined PBNA's performance in these three non-MSA West Virginia counties for analysis purposes (West Virginia Non-MSA AA). Brooke County, West Virginia is located within the Weirton-Steubenville, WV-OH MSA. Therefore, we evaluated PBNA's performance in Brooke County separately from PBNA's performance in the West Virginia non-MSA counties (Brooke County AA). PBNA's performance in its West Virginia non-MSA counties and its performance in Brooke County were considered in arriving at conclusions regarding PBNA's performance in the State of West Virginia.

PBNA's branch offices and ATMs are located within its AAs. PBNA's AAs meet regulatory requirements and do not arbitrarily exclude any low-or moderate-income (LMI) geographies.

In arriving at the overall conclusions for PBNA's performance in each of its AAs, more weight was placed on PBNA's performance in its Wheeling, West Virginia/Ohio MSA AA than in its West Virginia non-MSA AA or its Brooke County AA. More weight was placed on PBNA's performance in its Wheeling, West Virginia/Ohio MSA AA since this is the AA in which PBNA operates the majority of its branch offices, derives the majority of its deposits, and originates the majority of its loans.

Ratings

The bank's overall rating is a blend of the multi-state metropolitan area rating and state rating.

The institution's CRA rating takes into account the ratings in different states/multistate metropolitan areas by considering:

- The significance of the bank's activities in each state/multistate metropolitan area compared with the bank's overall activities.
- The lending opportunities in each state/multistate metropolitan area.
- The importance of the bank in providing loans to each state/multistate metropolitan area, particularly in light of the number of other institutions and the extent of their activities in each state/multistate metropolitan area.
- Demographic and economic conditions in each state/multistate metropolitan area.

Refer to the "Scope" section under each State and Multi-state Metropolitan Area Rating section for details regarding how the areas were weighted in arriving at the respective ratings.

Fair Lending or Other Illegal Credit Practices Review

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

Multistate Metropolitan Area Rating

Wheeling, West Virginia/Ohio MSA

CRA Rating for the Wheeling WV/OH MSA: Satisfactory.

The Lending test is rated: Satisfactory.

- PBNA originated residential real estate loans to Wheeling, West Virginia/Ohio MSA AA borrowers of different incomes.
- PBNA originated small business loans to Wheeling, West Virginia/Ohio MSA AA businesses of different sizes.
- PBNA originated residential real estate loans among its Wheeling, West Virginia/Ohio MSA AA geographies.
- PBNA originated small business loans among its Wheeling, West Virginia/Ohio MSA AA geographies.

DESCRIPTION OF INSTITUTION'S OPERATIONS IN THE WHEELING WEST VIRGINIA / OHIO MULTISTATE METROPOLITAN AREA

PBNA has its strongest presence in its Wheeling, West Virginia/Ohio MSA AA, relative to its other AAs. According to FDIC market share reports, PBNA ranked eighth for deposit market share among financial institutions taking deposits within its Wheeling, West Virginia/Ohio MSA AA. PBNA garnered 5% of the total dollar amount of deposits within the Wheeling, West Virginia/Ohio MSA AA.

Throughout its AAs, PBNA operates nine branch office locations. PBNA's physical presence within its Wheeling, West Virginia/Ohio MSA AA consists of five branch office locations. Relative to PNBA's total branch network, its Wheeling, West Virginia/Ohio MSA branches represent 56% of the total.

PBNA's Wheeling West Virginia/Ohio, MSA AA is predominately suburban in nature. The Wheeling, West Virginia/Ohio MSA AA consists of whole contiguous geographies located within Belmont County in Ohio, and Marshall and Ohio Counties in West Virginia. PBNA's Wheeling, West Virginia/Ohio MSA AA geographies total forty-nine. Of the forty-nine geographies which comprise PBNA's Wheeling, West Virginia/Ohio MSA AA, two, twelve, twenty-five and ten are categorized as low, moderate, middle and upper-income respectively. Of the five Wheeling West Virginia/Ohio, MSA AA branch offices two, representing 40%, are located within moderate-income AA geographies.

For PBNA's Wheeling, West Virginia/Ohio MSA AA, 2000 census data reports a total population of 153,172, total households of 62,347, and total families of 41,781. HUD data, updated for 2011, reports the Wheeling, West Virginia/Ohio MSA AA median

family income to be \$50,400. Demographic information derived from annually updated HUD data also reports that of total AA families, 20%, 19%, 22%, and 39% are of low, moderate, middle and upper-income respectively.

For PBNA's Wheeling, West Virginia/Ohio MSA AA, the majority of households (68%) were supported by wage or salaried jobs. For the same years, of Wheeling, West Virginia/Ohio MSA AA households, 18% report persons over sixty five, 35% derive income from social security, and 16% subsist below poverty level. The 2000 census data also reports that for total Wheeling, West Virginia/Ohio MSA AA housing units, 66% were owner occupied and the median housing value equaled \$64,574. Housing stock consisted primarily of older homes with a median year built of 1954. These AA demographic factors impact loan demand for residential mortgage loans. Particularly affected is residential mortgage demand from low and moderate-income borrowers impacted by issues concerning housing availability and affordability.

According to 2011 business demographic data, 11,418 businesses operate within PBNA's Wheeling, West Virginia/Ohio MSA AA, of which 421 are farms. Small Wheeling, West Virginia/Ohio MSA AA businesses, which report revenues less than or equal to \$1 million, total 7,606 and represent 64% of total Wheeling, West Virginia/Ohio MSA AA businesses. Approximately 57% of Wheeling, West Virginia/Ohio MSA AA businesses reported having less than four employees. Of Wheeling, West Virginia/Ohio MSA AA businesses, 40% are classified as service related and 14% are classified as retail trade. Additional Wheeling, West Virginia/Ohio MSA AA businesses are classified as follows: finance, insurance and real estate (6%), construction (6%), transportation and communication (3%), manufacturing (2%), wholesale trade (3%), agriculture, forestry and fishing (4%) and public administration (2%). Of the remaining Wheeling AA businesses, 19% are considered to be non-classified.

PBNA encounters competition within its Wheeling, West Virginia/Ohio MSA AA for both deposits and loans. Area competition is considered to be very strong and emanates from local community banks and regional financial institutions. Specifically, Wheeling, West Virginia/Ohio MSA AA competition emanates primarily from several local and regional financial institutions, some of which have been established in the area for many years. According to the June 30, 2011 FDIC Summary of Deposits Market Share Report, PBNA was ranked 8th out of 15 institutions in the Wheeling, West Virginia/Ohio MSA with 4.9% of deposits. WesBanco is ranked first with 15 offices in the MSA and 37.1% of the deposits. Fifty-five percent of the bank's local competitors operate three or more branches within the Wheeling, West Virginia/Ohio MSA and include United Bank and Citizens Savings Bank. Additional competitors operating multiple branch offices within the AA include larger multi-state financial institutions such as Branch Banking and Trust Co (BB&T), JP Morgan Chase Bank, and PNC Bank.

Examiners initiated contact with one community-based organization within PBNA's Wheeling, West Virginia/Ohio MSA AA. Specifically, examiners contacted the finance director of a local regional economic development partnership. The contact stated that the competition for deposits in the area has declined as the deposits related to the Marcellus Shale gas project have increased at all of the local institutions. Local businesses now want to see the area banks lending this money out as small business

working capital financing needs continue to exist, as well as the desire for longer-term, fixed-rate commercial loans. As the Marcellus Shale business has grown, the need for satellite businesses that provide services to the gas companies has also grown, resulting in financing needs for these companies. The contact stated that although there has been some increase in lending, working capital financing for small businesses is a critical opportunity for participation for a bank.

SCOPE OF EVALUATION IN THE WHEELING WEST VIRGINIA / OHIO MULTISTATE METROPOLITAN AREA

In arriving at the Lending Test conclusions, more weight was placed on PBNA's performance in its Wheeling, West Virginia/Ohio MSA AA since this is the AA in which PBNA operates the majority of its branch offices, derives the majority of its deposits and originates the majority of its loans.

PBNA's record of lending was evaluated by measuring and analyzing residential mortgage and small business loans originated by PBNA during 2009, 2010, and 2011. Similar weight was placed on PBNA's record of originating residential mortgage and small business loans since both are considered primary loan products and loan volume was not dissimilar.

Residential mortgages consist of loans with purposes of home purchase, home improvement and/or home mortgage refinance. PBNA reported its residential real estate loan originations according to HMDA requirements. In order to evaluate PBNA's record of originating residential mortgage loans, we measured and analyzed PBNA's reported HMDA data. In order to evaluate PBNA's record of originating small business loans, we measured and analyzed PBNA loan data collected from a random sample of non-farm, non-residential, real estate loans and commercial and industrial loans.

CONCLUSIONS WITH RESPECT TO PERFORMANCE TESTS IN THE WHEELING WEST VIRGINIA / OHIO MULTISTATE METROPOLITAN AREA

PBNA's performance within its Wheeling West Virginia / Ohio multi-state metropolitan area is satisfactory.

Conclusions with respect to PBNA's performance in the Wheeling WV/OH multi-state MSA were based on PBNA's performance in its Wheeling, West Virginia/Ohio MSA AA. Conclusions were based on PBNA's record of originating residential real estate and originating small business loans.

PBNA's record of originating residential real estate and small business loans reflects reasonable penetration among Wheeling, West Virginia/Ohio MSA AA borrowers of different income levels and businesses of different sizes. PBNA's record of originating residential real estate and small business loans reflects reasonable dispersion among Wheeling, West Virginia/Ohio MSA AA geographies regardless of income level.

LENDING TEST

The bank's performance under the lending test in the Wheeling West Virginia / Ohio MSA is rated satisfactory.

Loan-to-Deposit Ratio

PBNA's loan-to-deposit ratio as compared to the average loan-to-deposit ratio exhibited by peer banks over the same period is reasonable.

The analysis of PBNA's record of lending as demonstrated by its ratio of loans to deposits was performed at the bank level. To assess PBNA's lending activity we analyzed loan-to-deposit data inclusive of loans originated over the evaluation period for both PBNA and its peer group. PBNA's loan-to-deposit ratio was compared against a customized local peer group of banks. The local peer group consisted of banks with assets totaling \$500 million or less located within the seven West Virginia and Ohio counties in which PBNA operates.

Lending activity was measured by comparing the eighteen quarter average loan to deposit ratios reported by PBNA and its local peer group. The eighteen quarter average loan to deposit ratio was calculated using financial data reported since the previous evaluation. Specifically, the calculation included quarter-end financial data reported for each of the eighteen quarters from 9/30/07 through 12/31/11.

PBNA's record of originating loans compares reasonably to its peer group, particularly given the context in which PBNA operates. Specifically, PBNA reported an eighteen quarter average loan to deposit ratio of 55%. In comparison, the local peer group reported an eighteen quarter average loan-to-deposit ratio of 60%. The local peer group average loan-to-deposit ratio calculation was impacted by two loan-to-deposit ratios considered to be outliers.

Of the two loan-to-deposit ratios considered to be outliers, one was considered to be significantly higher (97%) and the other was considered to be significantly lower (26%) than the peer group average. Removing the two outlying loan-to-deposit ratios from the peer group calculation produced an average peer loan-to-deposit ratio over the most recent 18 quarters which equaled 59%. PBNA's loan to deposit ratio of 55% compares reasonably to both the custom peer group loan to deposit ratio and the adjusted custom peer group loan to deposit ratio of 60% and 59% respectively.

PBNA's opportunities to lend are also impacted by area loan demand and competition. Lending opportunities are affected by loan demand which is impacted by housing availability and affordability. Lending opportunities are also impacted by competition for loans emanating from other loan originators. In addition, current residential real estate lending has been impacted by the temporary influx of workers associated with Marcellus Shale projects. The available LMI housing options within the area are now occupied by

the Marcellus Shale workers, thus reducing the already limited LMI available housing options in the area.

Lending in Assessment Area

PBNA originated a substantial majority of its residential mortgage loans and small business loans inside its combined AAs.

The analysis of PBNA's record of lending in its AAs was performed at the bank level. In order to evaluate this record, we measured and analyzed PBNA's record of originating loans inside versus outside of its combined AAs. Further, this analysis focused on PBNA's record of originating residential mortgage and small business loans within its combined AAs, since these loans constitute PBNA's primary loan products.

Lending in the AAs was assessed by measuring and analyzing residential real estate and small business loans originated by PBNA during 2009, 2010, and 2011. We analyzed residential real estate data collected and reported over the evaluation period, according to HMDA requirements. PBNA's residential real estate loan originations included loans for purposes of home purchase, home improvement and home refinance. We also analyzed loans to small businesses by collecting data from a random sample of loans originated by PBNA.

PBNA's residential real estate data revealed that 90% and 89%, respectively, of the number and dollar amounts of home mortgage loans originated were within PBNA's combined AAs during the evaluation period. Similarly, PBNA's small business data revealed that 96% and 80%, respectively, of the number and dollar amounts of small business loans were originated within PBNA's combined AAs during the evaluation period.

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

PBNA's record of originating residential real estate and small business loans reflects a reasonable dispersion among Wheeling, West Virginia/Ohio MSA AA borrowers of different income levels and businesses of different sizes.

Wheeling, West Virginia/Ohio MSA AA - Residential Real Estate Lending

Data collected and reported by PBNA in accordance with HMDA requirements, reflecting residential real estate loan originations in its Wheeling, West Virginia/Ohio MSA AA, was analyzed.

The analysis was performed to assess PBNA's record of distributing its residential real estate loan originations among Wheeling, West Virginia/Ohio MSA AA borrowers of different income levels.

Demographic data, compiled during the 2000 census for PBNA's Wheeling, West Virginia/Ohio MSA AA, reports income levels of AA families as follows:

- 19.89% of Wheeling, West Virginia/Ohio MSA AA families are low-income families
- 18.65% of Wheeling, West Virginia/Ohio MSA AA families are moderate-income families
- 21.95% of Wheeling, West Virginia/Ohio MSA AA families are middle-income families
- 39.50% of Wheeling, West Virginia/Ohio MSA AA families are upper-income families

Wheeling, West Virginia/Ohio MSA AA demographic information was derived from annually updated HUD data. Low-income Wheeling, West Virginia/Ohio MSA AA families, by definition, are families with annual incomes below \$25,200. Moderate-income Wheeling, West Virginia/Ohio MSA AA families, by definition, are families with annual incomes between \$25,200 and \$38,856.

The following table details the distribution of residential real estate loans originated by PBNA during the evaluation period in its Wheeling, West Virginia/Ohio MSA AA among borrowers of different income levels.

Table 1 - Brooke County AA Geographic Distribution of Residential Real Estate Loans								
Borrower Income Level	Low		Moderate		Middle		Upper	
Loan Type	% of AA Families	% of PBNA Number of Loans	% of AA Families	% of PBNA Number of Loans	% of AA Families	% of PBNA Number of Loans	% of AA Families	% of PBNA Number of Loans
Home Purchase	19.89%	5.88%	18.65%	13.73%	21.95%	19.61%	39.50%	60.78%
Home Improvement	19.89%	14.17%	18.65%	25.98%	21.95%	25.98%	39.50%	33.86%
Home Mortgage Refinance	19.89%	5.00%	18.65%	18.75%	21.95%	22.50%	39.50%	53.75%

As noted in the table above, PBNA’s record of originating residential mortgages to low-income AA borrowers does not reflect the percentage of Wheeling, West Virginia/Ohio MSA AA families that are classified as low-income. PBNA’s record of originating home improvement loans to low-income AA borrowers is somewhat lower than the percentage of AA families that are classified as low-income. PBNA’s record of originating home mortgage refinance loans to low-income AA borrowers does not reflect the percentage of Wheeling, West Virginia/Ohio MSA AA families that are classified as low-income. PBNA’s record of originating home purchase loans to moderate-income AA borrowers is somewhat lower than the percentage of Wheeling, West Virginia/Ohio MSA AA families that are classified as moderate-income. PBNA’s record of originating home improvement and home mortgage refinance loans to moderate-income AA borrowers however, exceeds the percentage of moderate-income AA families.

Opportunities to originate residential real estate loans within the Wheeling, West Virginia/Ohio MSA AA may be impacted by demographics, including the extent to which the Wheeling, West Virginia/Ohio MSA AA population is age 65 or older, retired, eligible for social security and/or at or below poverty level. Other lending-related activities, such as loan originations for sale to the secondary markets, community development loans, or lending-related qualified investments and services, helped meet the credit needs of the bank AA.

Wheeling, West Virginia/Ohio MSA AA Small Business Lending

Data collected from a sample of PBNA's small business loan originations in its Wheeling, West Virginia/Ohio MSA AA was analyzed. The analysis was performed to assess PBNA's record of distributing its small business loan originations among Wheeling, West Virginia/Ohio MSA AA businesses of different sizes. Specifically, we collected and analyzed data from 25 small business loans that PBNA originated to Wheeling, West Virginia/Ohio MSA AA businesses.

Business demographic data compiled from the 2000 census for PBNA's Wheeling, West Virginia/Ohio MSA AA shows the following revenue results:

- 62.97% of AA businesses report annual revenues < or = \$1 million
- 3.39% of AA businesses report annual revenues > than \$1 million
- 33.64% of AA businesses did not report annual revenues

Wheeling, West Virginia/Ohio MSA AA demographic information, derived from Dun and Bradstreet reports, shows that of all AA businesses 63% are classified as small. Small business loans are defined as those loans made to business enterprises whose annual gross revenues are \$1 million or less.

Of total Wheeling, West Virginia/Ohio MSA AA businesses, 7,578 or 66.4% reported annual revenues. Of the Wheeling, West Virginia/Ohio MSA AA businesses which reported annual revenues, 94.8% reported annual revenues less than or equal to \$1 million and 5.1% reported annual revenues greater than \$1 million. Comparatively, 68% of business loans originated by PNBA were to Wheeling, West Virginia/Ohio MSA AA small businesses.

PBNA has demonstrated responsiveness to the needs of Wheeling, West Virginia/Ohio MSA AA small businesses. The majority of small business loans originated by PBNA to AA businesses represent the smaller dollar amounts needed by small AA businesses. For example, of the analyzed AA small business loans, 48% were originated for dollar amounts of \$50,000 or less.

Geographic Distribution of Loans

PBNA's record of originating residential mortgage and small business loans among Wheeling, West Virginia/Ohio MSA AA geographies of different income levels reflects an excellent dispersion among AA geographies.

Wheeling, West Virginia/Ohio MSA AA Residential Real Estate Lending

Data collected and reported by PBNA in accordance with HMDA requirements was analyzed. The analysis was performed to assess PBNA's record of distributing its residential real estate loan originations among Wheeling, West Virginia/Ohio MSA AA geographies of different income levels. Collected and reported data revealed that PBNA originated 281 residential real estate loans to Wheeling, West Virginia/Ohio MSA AA borrowers during the evaluation period.

Demographic data compiled during the 2000 U.S. census for PBNA's Wheeling, West Virginia/Ohio MSA AA indicates that owner-occupied AA housing is geographically dispersed as follows:

- 0.78% of AA owner occupied housing is located in low-income geographies
- 9.86% of AA owner occupied housing is located in moderate-income geographies
- 68.87% of AA owner occupied housing is located in middle-income geographies
- 20.49% of AA owner occupied housing is located in upper-income geographies

Wheeling, West Virginia/Ohio MSA AA demographic information derived from 2000 census data reports that just 0.8% and 9.9% are located within the Wheeling, West Virginia/Ohio MSA AA's low and moderate-income geographies, respectively. The vast majority of all owner-occupied housing is located in the AA's middle and upper-income geographies.

The following table details the distribution of residential real estate loans originated by PBNA during the evaluation period in its Wheeling, West Virginia/Ohio MSA AA among geographies of different income levels.

Census Tract Income Level	Low		Moderate		Middle		Upper	
	% of AA Owner Occupied Housing	% of PBNA Number of Loans	% of AA Owner Occupied Housing	% of PBNA Number of Loans	% of AA Owner Occupied Housing	% of PBNA Number of Loans	% of AA Owner Occupied Housing	% of PBNA Number of Loans
Home Purchase	0.78	0.00	9.86	5.77	68.87	59.62	20.49	34.62
Home Improvement	0.78	1.40	9.86	11.89	68.87	48.95	20.49	37.76
Home Refinance	0.78	1.16	9.86	11.63	68.87	52.33	20.49	34.88

As noted in the table above, PBNA's record of originating home purchase loans in low-income AA geographies approximates the percentage of AA owner-occupied housing available within these geographies. PBNA's record of originating home improvement

and home refinance loans within low-income AA geographies exceeds the percentage of owner-occupied housing available within these low-income AA geographies.

PBNA's record of originating home purchase loans within moderate-income AA geographies approximates the percentage of owner-occupied housing available within these moderate-income AA geographies. PBNA's record of originating home improvement and home mortgage refinance loans in moderate-income AA geographies exceeds the percentage of AA owner-occupied housing available within these geographies.

Wheeling, West Virginia/Ohio MSA AA Small Business Lending

Data collected from a sample of PBNA's small business loans originated in its Wheeling, West Virginia/Ohio MSA AA was analyzed. The analysis was performed to assess PBNA's record of distributing small business loan originations among Wheeling, West Virginia/Ohio MSA geographies of different income levels. Specifically, we sampled 25 small business loans that PBNA originated to Wheeling, West Virginia/Ohio MSA AA businesses.

Demographic data compiled during the 2000 U.S. census for PBNA's Wheeling, West Virginia/Ohio MSA AA indicates that AA businesses are geographically dispersed as follows:

- 2.79% businesses are located in low-income geographies
- 20.74% businesses are located in moderate-income geographies
- 55.31% businesses are located in middle-income geographies
- 21.17% businesses are located in upper-income geographies

PBNA's record shows that 4% and 24% of small business loans originated by PBNA were originated within low and moderate-income AA geographies, respectively. Comparatively, of AA businesses, 2.8% and 20.7% are located within low and moderate-income Wheeling, West Virginia/Ohio MSA AA geographies, respectively.

PBNA's record of originating small business loans in Wheeling, West Virginia/Ohio MSA AA low-income geographies exceeds the percentage of businesses located within low-income AA geographies. PBNA's record of originating small business loans in Wheeling, West Virginia/Ohio MSA AA moderate-income geographies exceeds the percentage of businesses located within moderate-income AA geographies.

Responses to Complaints

No complaints have been received since the previous examination.

State Rating

State of West Virginia

CRA Rating for West Virginia: Satisfactory.

The Lending test is rated: Satisfactory.

- PBNA originated residential real estate loans to West Virginia AA borrowers of different incomes.
- PBNA originated small business loans to West Virginia AA businesses of different sizes.

Note: The net loan-to-deposit ratio and percentage of loans and other lending-related activity in the assessment area only apply to the institution overall. No discussion of these performance criteria applies to sections of the performance evaluation relating to states and assessment areas.

DESCRIPTION OF INSTITUTION'S OPERATIONS IN WEST VIRGINIA

PBNA has designated two separate West Virginia AAs, one of which is comprised of Lewis and Upshur Counties and the other is comprised of Wetzel County. Lewis, Upshur and Wetzel Counties in West Virginia are not located within an MSA. Lewis and Upshur Counties are situated adjacent to one another, but not adjacent to Wetzel County. As it pertains to this evaluation however, since Lewis, Upshur and Wetzel Counties are not located within an MSA, PBNA's performance in the three counties has been combined for analysis purposes. Brooke County, West Virginia is located within the Weirton-Steubenville, WV-OH multi-state MSA. Since Brooke County is located in an MSA, PBNA's performance in Brooke County was analyzed separately.

West Virginia Non MSA AA

Over the evaluation period, according to FDIC market share reports, PBNA ranked seventh for deposit market share among financial institutions taking deposits from within its West Virginia non-MSA AA. Within its West Virginia non-MSA AA, PBNA has garnered 7% of the total dollar amount of West Virginia non-MSA AA deposits. PBNA encounters competition within its West Virginia non-MSA AA for both deposits and loans.

Of its relative presence within each of its AAs, PBNA has its strongest presence in its Wheeling, West Virginia/Ohio MSA AA. PBNA's physical presence in its West Virginia non-MSA AA consists of a branch network comprised of three office locations. Relative to PBNA's bank-wide, branch network, its West Virginia non MSA branches represent 33% of the total.

PBNA's West Virginia non MSA AA is predominately rural in nature. PBNA's West Virginia non-MSA AA consists of whole contiguous geographies located within Lewis, Upshur and Wetzel counties in West Virginia. PBNA's West Virginia non MSA geographies total sixteen. Of the sixteen geographies which comprise PBNA's West Virginia non MSA AA, thirteen and three were categorized as middle- and upper-income respectively. Of the sixteen West Virginia non-MSA AA geographies, none are classified as low- or moderate-income.

For PBNA's West Virginia non-MSA AA, 2000 census data reports a total population of 58,016, total households of 23,134 and total families of 16,385. HUD data updated for 2011 reports the West Virginia non-MSA median family income to be \$44,800. Demographic information, derived from annually updated HUD data, also reports that of total AA families, 20%, 17%, 21%, and 42% are of low, moderate, middle and upper income respectively.

For PBNA's West Virginia non-MSA AA, the majority of households (65%) were supported by wage or salaried jobs. For the same years, of West Virginia non-MSA AA households, 16% report persons over sixty five, 37% derive income from social security, and 20% subsist below poverty level. The 2000 census data also reports that for 2011, of total West Virginia non-MSA AA housing units, 65% were owner occupied and the median housing value equaled \$62,331. Housing stock consists primarily of older homes with a median year built of 1967. These AA demographic factors impact loan demand for residential mortgage loans. Particularly affected is residential mortgage demand from low- and moderate-income borrowers impacted by issues concerning housing availability and affordability.

According to the 2011 business demographic data, 5,776 businesses operate within PBNA's West Virginia non-MSA AA, of which 161 are farms. Small West Virginia non-MSA businesses, which report revenues less than or equal to \$1 million, total 3,425 and represent 59% of total West Virginia non-MSA AA businesses. Approximately 55% of West Virginia non-MSA businesses reported having less than four employees. Of West Virginia non-MSA AA businesses, 30% are not classified establishments; however, 40% are classified as services. Additional West Virginia non MSA AA businesses are classified as follows: retail trade (10%), construction (4%), transportation and communication (3%), finance, insurance and real estate (3%), agriculture, forestry and fishing (3%), manufacturing (2%), wholesale trade (2%), public administration (2%) and mining (1%).

Area competition is considered to be very strong and emanates from local community banks, regional banks, national non-bank financing institutions, and mortgage companies. Specifically, West Virginia non-MSA AA competition emanates primarily from several local and regional financial institutions, some of which have been established in the area for many years. According to the June 30, 2011 FDIC Summary of Deposits Market Share Report, PBNA was ranked 7th out of 13 institutions in the WV non-MSA AA with 6.8% of deposits. Citizens Bank of Weston is ranked first with two offices in the AA and 15.9% of the deposits. Local competitors operating three or more branches within the West Virginia non-MSA AA include Peoples Bank and WesBanco. Additional competitors operating multiple branch offices within the AA include First

Community Bank and Doolin Security SB, FSB. PBNA also competes for loans with a larger multi-state financial institution.

Examiners initiated contact with one community-based organization within PBNA's West Virginia non-MSA AA. Specifically, examiners contacted the Accounting/Human Resources Manager of a community service organization serving numerous local non-MSA West Virginia counties. The community contact stated that there are currently a variety of needs in the local area, including improved access to mortgage, credit card, short-term, and college loans. The contact also cited that job losses in the community are leading to more families dealing with foreclosure issues. The contact further stated that unemployment and affordable housing is a big problem in many of their counties, although some more than others. Some factories and plants have closed and underemployment is common. Substandard housing is also a problem. There are no good opportunities for rentals due to the location and/or condition of the rentals. Additionally, the contact identified a community need for more local financial institutions to partner with their agency (or other agencies like themselves). There is a greater need for the banks to understand where the people in crisis are coming from and for the banks to work on solutions to help those people in a mortgage crisis.

Brooke County AA

Over the evaluation period, according to FDIC market share reports, PBNA ranked number four out of four for deposit market share among financial institutions taking deposits from within its Brooke County AA. Within its Brooke County AA, PBNA has garnered 8% of the total dollar amount of Brooke County AA deposits. PBNA encounters competition within its Brooke County AA for both deposits and loans. PBNA's physical presence in its Brooke County AA consists of a single branch office location. Relative to PBNA's bank-wide branch network, its Brooke County branches represent 11% of the total.

PBNA's Brooke County AA is situated within the Weirton-Steubenville, WV-OH MSA. The Weirton-Steubenville, WV-OH MSA consists of Brooke and Hancock Counties in West Virginia and Jefferson County in Ohio. PBNA's Brooke County AA consists of whole contiguous geographies located within Brooke County in West Virginia. PBNA's Brooke County contains seven geographies. Of the seven geographies which comprise PBNA's Brooke County AA, all seven are categorized as middle-income. None of the Brooke County geographies are classified as low-, moderate-or upper-income.

For PBNA's Brooke County AA, 2000 census data reports total population of 25,447, total households of 10,410 and total families of 7,190. HUD data updated for 2007 reports the Brooke County AA median family income to be \$51,000. Demographic information derived from annually updated HUD data, also reports that for 2011, of total AA families, 17%, 18%, 25%, and 40% are of low, moderate, middle and upper-income respectively.

For PBNA's Brooke County AA, the majority of households (67%) were supported by wage or salaried jobs. For the same years, of Brooke County AA households, 18% report persons over sixty five, 37% derive income from social security, and 11% subsist

below poverty level. The 2000 census data also reports that for 2011, of total Brooke County AA housing units, 71% were owner occupied and the median housing value equaled \$64,688. Housing stock consists primarily of older homes with a median year built of 1959. These AA demographic factors impact loan demand for residential mortgage loans. Particularly affected is residential mortgage demand from low and moderate-income borrowers impacted by issues concerning housing availability and affordability.

According to the 2011 business demographic data, 1,729 businesses operate within PBNA's Brooke County AA, of which 29 are farms. Small Brooke County AA businesses, which report revenues less than or equal to \$1 million, total 1,013 and represent 59% of total Brooke County AA businesses. Approximately 53% of Brooke County AA businesses reported having less than four employees. Of Brooke County AA businesses, 40% are classified as service and 12% are classified as retail trade. Additional Brooke County AA businesses are classified as follows: construction (5%), finance, insurance and real estate (4%), transportation and communication (3%), manufacturing (2%), wholesale trade (2%), public administration (2%), agriculture, forestry and fishing (2%) and mining (1%). Of the remaining Brooke County AA businesses, 27% are considered to be non-classified.

Area competition is considered to be very strong and emanates from local community banks which have been established in the area for many years. Local competitors operating multiple branches within the Brooke County AA include WesBanco and Parkvale Savings Bank. According to the June 30, 2011 FDIC Summary of Deposits Market Share Report, PBNA was ranked 4th out of 4 institutions in the Brooke County AA with 8.38% of deposits. WesBanco is ranked first with two offices in the AA and 46.09% of the deposits.

Examiners initiated contact with one community-based organization within PBNA's Brooke County AA. Specifically, examiners contacted the Housing Manager of a local nonprofit housing provider. The organization has identified credit and community development needs including weatherization of older properties, decent and affordable housing for low-income families, access to basic healthcare services for the uninsured and underinsured, asset building strategies that lead to self-sufficiency, and emergency financial assistance to help with basic day to day living expenses for people who have lost jobs. The community contact identified a community need for local financial institutions to provide more financial support for programs and services and to ease up on underwriting standards which prevent otherwise credit-worthy borrowers from obtaining mortgages. He did state that more banks and credit unions are offering First Time Homebuyer programs wherein they give the homebuyer a break on the interest rate. This has resulted in reducing some of the excess housing inventory.

SCOPE OF EVALUATION IN WEST VIRGINIA

For purposes of arriving at the Lending Test conclusions for the State of West Virginia, more weight was placed on PBNA's performance in its West Virginia non-MSA AA than in its Brooke County AA. More weight was placed on PBNA's performance in its West Virginia non-MSA AA since, within the West Virginia AAs, this is the AA in which PBNA operates the majority of its branch offices, derives the majority of its deposits and originates the majority of its loans.

In arriving at the Lending Test conclusions, similar weight was placed on PBNA's record of originating residential mortgage and business purpose loans since loan volume over the evaluation period for these products was not dissimilar. PBNA's record of originating residential mortgage loans was measured by evaluating PBNA's home purchase, home improvement, and home mortgage refinance loan originations.

Also for the Lending Test, consideration was given to the fact that PBNA's non-MSA AA and Brooke County MSA AA do not contain any low-or moderate-income geographies.

Consideration was also given to the fact that PBNA's non-MSA AA and Brooke County MSA AA do, however, contain middle-income geographies that are designated as distressed.

CONCLUSIONS WITH RESPECT TO PERFORMANCE TESTS IN WEST VIRGINIA

PBNA's performance within the State of West Virginia is satisfactory.

Conclusions with respect to PBNA's performance in the State of West Virginia were based on PBNA's performance in its West Virginia non-MSA AA and its Brooke County AA. Conclusions, with respect to PBNA's performance in these AAs were based on PBNA's record of originating residential real estate and small business loans.

PBNA's record of originating residential real estate and small business loans reflects reasonable penetration among West Virginia AA borrowers of different income levels and businesses of different sizes. Other lending-related activities, such as loan originations for sale to the secondary markets, community developments loans, or lending-related qualified investments and services, helped meet the credit needs of the bank's AAs.

LENDING TEST

The bank's performance under the lending test in the State of West Virginia is rated satisfactory.

PBNA's record of originating residential real estate and small business loans, given AA demographics, reflects reasonable penetration among West Virginia AA borrowers of different income levels and businesses of different sizes.

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

West Virginia non-MSA AA Residential Real Estate Lending

Data collected and reported by PBNA reflecting residential real estate loans originated in its West Virginia non-MSA AA was analyzed. The analysis was performed to assess PBNA’s record of distributing its residential real estate loan originations among West Virginia non-MSA AA borrowers of different income levels. Collected and reported data revealed that during the evaluation period, PBNA originated 109 residential real estate loans to West Virginia non-MSA AA borrowers.

Demographic data compiled during the 2000 census for PBNA’s West Virginia non-MSA AA reports income levels of AA families as follows:

- 20.12% of West Virginia non-MSA AA families are low-income families
- 16.99% of West Virginia non-MSA AA families are moderate-income families
- 20.91% of West Virginia non-MSA AA families are middle-income families
- 41.99% of West Virginia non-MSA AA families are upper-income families

West Virginia non-MSA AA demographic information, derived from annually updated HUD data, reports that of all AA families, 20.12% and 16.99% are classified as low and moderate-income respectively. Low-income West Virginia non-MSA AA families, by definition, are families with annual incomes below \$22,400. Moderate-income West Virginia non-MSA AA families, by definition, are families with annual incomes between \$22,400 and \$32,500.

The following table details the distribution of residential real estate loans originated by PBNA during the evaluation period in its West Virginia non-MSA AA among borrowers of different income levels.

Table 3 - West Virginia Non-MSA AA Borrower Distribution of Residential Real Estate Loans								
Borrower Income Level	Low		Moderate		Middle		Upper	
	% of AA Families	% of PBNA Number of Loans	% of AA Families	% of PBNA Number of Loans	% of AA Families	% of PBNA Number of Loans	% of AA Families	% of PBNA Number of Loans
Home Purchase	20.12%	10.00%	16.99%	5.00%	20.91%	30.00%	41.99	55.00%
Home Improvement	20.12%	7.69%	16.99%	13.46%	20.91%	23.08%	41.99	55.77%
Home Mortgage Refinance	20.12%	0.00%	16.99%	13.33%	20.91%	20.00%	41.99	66.67%

As noted in the above table, PBNA's record of originating residential mortgages, home improvement, and home mortgage refinance loans to West Virginia non-MSA AA low-income and moderate-income borrowers does not reflect the percentage of West Virginia non-MSA AA families that are classified as low-income and moderate-income, nevertheless it is considered to be reasonable.

Opportunities to originate residential real estate loans within the West Virginia non-MSA AA may be impacted by demographics, including the extent to which the West Virginia non-MSA AA population is age 65 or older, retired, eligible for social security and/or at or below poverty level. Residential real estate lending opportunities may also be impacted by PBNA's minimal historic AA presence combined with significant competition. In addition, recent economic factors, such as plant closings in the area and the subsequent increase in unemployment also impact residential real estate lending.

Brooke County AA Residential Real Estate Lending

Data collected and reported by PBNA reflecting residential real estate loans originated in its Brooke County AA was analyzed. The analysis was performed to assess PBNA's record of distributing its residential real estate loan originations among Brooke County AA borrowers of different income levels. Collected and reported data revealed that during the evaluation period, PBNA originated 46 residential real estate loans to Brooke County AA borrowers.

Demographic data compiled during the 2000 census for PBNA's Brooke County AA reports income levels of AA families as follows:

- 17.20% of Brooke County AA families are low-income families
- 18.08% of Brooke County AA families are moderate-income families
- 25.23% of Brooke County AA families are middle-income families
- 39.49% of Brooke County AA families are upper-income families

Brooke County AA demographic information derived from annually updated HUD data reports that of all AA families, 17.20% and 18.08% are classified as low and moderate-income respectively. Low-income Brooke County AA families, by definition, are families with annual incomes below \$25,500. Moderate-income Brooke County AA families, by definition, are families with annual incomes between \$25,500 and \$39,497.

The following table details the distribution of residential real estate loans originated by PBNA during the evaluation period in its Brooke County AA among borrowers of different income levels.

Table 4 - Brooke County AA Borrower Distribution of Residential Real Estate Loans								
Borrower Income Level	Low		Moderate		Middle		Upper	
Loan Type	% of AA Families	% of PBNA Number of Loans	% of AA Families	% of PBNA Number of Loans	% of AA Families	% of PBNA Number of Loans	% of AA Families	% of PBNA Number of Loans
Home Purchase	17.20%	0.00%	18.08%	60.00%	25.23%	0.00%	39.49%	40.00%
Home Improvement	17.20%	7.14%	18.08%	21.43%	25.23%	42.86%	39.49%	28.57%
Home Mortgage Refinance	17.20%	4.35%	18.08%	8.70%	25.23%	47.83%	39.49%	39.13%

As noted in the above table, PBNA’s record of originating home purchase, home improvement, and home mortgage refinance loans to low-income, Brooke County AA borrowers does not reflect the percentage of AA families that are classified as low-income, although it is considered reasonable.

However, PBNA’s record of originating residential mortgages and home improvement loans to moderate-income AA borrowers significantly exceeds the percentage of AA families that are classified as moderate-income. PBNA’s record of originating home mortgage refinance loans to West Virginia non-MSA AA moderate-income borrowers does not reflect the percentage of West Virginia non-MSA AA families that are classified moderate-income, nevertheless it is considered to be reasonable.

Opportunities to originate residential real estate loans within the Brooke County AA may be impacted by demographics, including the extent to which the Brooke County AA population is age 65 or older, retired, eligible for social security and/or at or below poverty level combined with the median AA housing value. Residential real estate lending opportunities may also be impacted by PBNA’s minimal historic AA presence combined with significant competition. In addition, current residential real estate lending has been impacted by the temporary influx of workers associated with the Marcellus Shale project. The available LMI housing options within the area are now occupied by the Marcellus Shale workers, thus reducing the already limited LMI available housing options in the area.

West Virginia non-MSA Small Business Lending

Data collected from a sample of PBNA’s small business loans, reflecting small business loans originated in its West Virginia non-MSA AA, was analyzed. The analysis was performed to assess PBNA’s record of distributing its business loan originations among West Virginia non-MSA businesses of different sizes. Specifically, during the evaluation period, we collected and analyzed data from 20 small business loans that PBNA originated to West Virginia non-MSA AA businesses.

Demographic data compiled during the 2000 census for PBNA's West Virginia non-MSA AA indicates that, of AA businesses which reported annual revenues, revenue was recorded as follows:

- 58.13% of AA businesses report annual revenues < or = \$1 million
- 1.78% of AA businesses report annual revenues > than \$1 million
- 40.09% of AA businesses did not report annual revenues

West Virginia non-MSA AA demographic information derived from Dun and Bradstreet reports that of all AA businesses, 58.1% are classified as small.

Of total West Virginia non-MSA AA businesses, 3,364 or 59.9%, reported annual revenues. Of the 3,364 West Virginia non-MSA AA businesses which reported annual revenues, 97.0% reported annual revenues less than or equal to \$1 million and 3.0% reported annual revenues greater than \$1 million.

Comparatively, of business purpose loans originated by PBNA to businesses during the evaluation period, 80% of business loans were originated to West Virginia non-MSA AA small businesses.

Of small business loans originated by PBNA to West Virginia non-MSA AA businesses, a majority represent the smaller dollar amounts needed by AA businesses. For example, of analyzed AA small business loans, 50% were originated for dollar amounts of \$50,000 or less.

Brooke County Small Business Lending

Data collected from a sample of PBNA's small business loans, reflecting small business loans originated in its Brooke County AA, was analyzed. The analysis was performed to assess PBNA's record of distributing its business loan originations among Brooke County AA businesses of different sizes. Collected data revealed that during the evaluation period, PBNA originated 15 small business loans to Brooke County AA businesses.

Demographic data compiled during the 2000 census for PBNA's Brooke County AA indicates that, of AA businesses which reported annual revenues, revenue was recorded as follows:

- 57.88% of AA businesses report annual revenues < or = \$1 million
- 3.12% of AA businesses report annual revenues > than \$1 million
- 39.00% of AA businesses did not report annual revenues

Brooke County AA demographic information derived from Dun and Bradstreet reports that of all AA businesses, 57.9% are classified as small.

Of total Brooke County AA businesses, 1,037, or 61.0%, reported annual revenues. Of the 1,037 Brooke County AA businesses which reported annual revenues, 94.9% reported annual revenues of < or = \$1 million and 5.1% reported annual revenues of > \$1 million.

Comparatively, of business purpose loans originated by PBNA to businesses during the evaluation period, 73% of business loans were originated to Brooke County AA small businesses.

Of small business loans originated by PBNA to Brooke County MSA AA businesses, a majority represent the smaller dollar amounts needed by AA businesses. For example, of analyzed AA small business loans, 47% were originated for dollar amounts of \$50,000 or less.

Geographic Distribution of Loans

West Virginia non-MSA AA

PBNA's West Virginia non-MSA AA does not contain any low or moderate-income geographies. Therefore, an analysis of PBNA's record of residential real estate lending among West Virginia non-MSA AA geographies would not have been meaningful and was not performed.

Brooke County AA

PBNA's Brooke County AA does not contain any low- or moderate-income geographies. Therefore, an analysis of PBNA's record of residential real estate lending among Brooke County AA geographies would not have been meaningful and was not performed.

Responses to Complaints

No complaints have been received since the last examination.