



PUBLIC DISCLOSURE

December 7, 2015

COMMUNITY REINVESTMENT ACT PERFORMANCE EVALUATION

Doolin Security Savings Bank, F.S.B.
Charter Number 703764

610 North State Route 2
New Martinsville, WV 26155

Office of the Comptroller of the Currency

Corporate One Office Park, Bldg 2
4075 Monroeville Blvd, Suite 300
Monroeville, PA 15146-2529

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 supporting the institution's rating, given the bank's size and performance context, include:

- Loan to deposit (LTD) ratio reasonable given internal and external factors within the assessment area (AA).
- A substantial majority of the loans originated during the evaluation period were originated within the AA.
- The distribution of loans represents a reasonable distribution among individuals of different income levels.
- The geographic distribution of loans reflects reasonable distribution among AA geographies.

Scope of Examination

Doolin Security Savings Bank ("Doolin" or the "bank") was evaluated under the Small Bank Community Reinvestment Act (CRA) evaluation procedures, which include a lending test. The lending test evaluates the bank's record of meeting the credit needs of its assessment areas (AA) through its lending activities.

CRA activities at Doolin were completed using the full-scope review procedures for its 2 AAs. Our review covered lending performance from January 1, 2013 through June 30, 2015. Residential mortgage loans are Doolin's primary loan product and our focus as part of this examination.

In order to evaluate Doolin's record of originating residential mortgage loans, we analyzed loan data the bank collected and reported in accordance with the Home Mortgage Disclosure Act (HMDA) requirements. In order to ensure the reliability of HMDA loan data, we performed a data integrity examination during the second quarter of 2015. We evaluated Doolin's processes to ensure the accuracy of collected HMDA data and tested a sample of Doolin's reported HMDA loans. We also tested the accuracy of Doolin's HMDA loan data by comparing it against the loan file documentation. The data integrity examination revealed that Doolin's publicly available HMDA loan data for 2012 and 2013 contained errors, which the bank corrected prior to the commencement of this evaluation. No errors were noted for the year 2014.

Description of Institution

Established in 1891, Doolin is a federally chartered mutual savings bank. The bank is located in New Martinsville, West Virginia. Doolin operates as a community financial institution offering residential mortgages, consumer loans, and a range of consumer deposit products.

Doolin operates 2 full-service branch locations and a limited service stand-alone drive-through facility. The main branch in New Martinsville is located in Wetzel County, WV. The other full-

service branch is located in Wood County, a non-contiguous county along the Ohio River to the southwest. Both branches have lobby and drive-up window facilities. The drive-through facility is located approximately 3 miles from the main branch in New Martinsville, WV. The drive-through facility is staffed but is not a full-service branch. Doolin did not open or close any branches during the evaluation period.

Both full-service branches offer traditional products and services. Doolin has customary operating hours, Monday through Friday, at all offices. Both branches and the drive-through facility offer Saturday hours. The bank also offers an informational internet website and on-line banking services. Table 1 lists the locations of offices with county specific AA and the income level of the geography (i.e., census tract) in which each is located.

| Table 1 – Doolin Offices | | | |
|---------------------------------|--|---------------------|-------------------------------|
| | Office Location | AA by County | Geography Income Level |
| 1 | New Martinsville, WV (Main Office, 610 N. State Rt. 2) | Wetzel | Middle |
| 2 | Parkersburg, WV (Full-Service Branch, 115 E. 4 th St) | Wood | Middle |
| 3 | New Martinsville, WV (Drive-Through, 155 Jefferson St) | Wetzel | Middle |

The institution is a mortgage portfolio lender. The bank’s mortgage products include fixed-rate and adjustable-rate loans for the purchase, refinance, and construction of one- to four-family dwellings. Consumer loan offerings consist of home equity loans and lines of credit, auto loans, personal unsecured loans, and loans for all-terrain and recreational vehicles, boats and marine craft, and mobile homes without real estate. Doolin does not offer commercial loans or deposit accounts. Table 2 shows the distribution of loans by lending category.

| Table 2 - Doolin’s Investment in Loans (Uniform Bank Performance Report as of June 30, 2015) | | | |
|---|-------------------------|-------------------------------|--------------------------------|
| Loan Category | Amount (\$000’s) | Percent of Total Loans | Percent of Total Assets |
| Real Estate Loans | \$7,761 | 90.6% | 15.8% |
| Commercial & Other Loans | \$0 | 0.0% | 0.0% |
| Individual Loans | \$808 | 9.4% | 1.6% |
| Total Loans | \$8,569 | 100.00% | 17.5% |

Doolin’s total assets as of June 30, 2015, were \$49 million, total deposits were \$42.8 million and tier 1 capital was \$5 million.

Doolin collaborated with Community Resources Incorporated (CRI) in 2014 as a means to increase lending to low-moderate income borrowers. CRI is located in Parkersburg, WV and empowers low- to moderate-income individuals and families to become self-sufficient, including providing home ownership assistance programs. CRI serves both of Doolin’s AAs as well as seven adjacent counties in west central West Virginia.

There are no legal or financial factors impeding the bank's ability to help meet the credit needs in its AA. At the prior CRA examination dated September 20, 2010, Doolin was rated "Satisfactory."

Description of Doolin Assessment Areas

Doolin operates in two distinct AAs in the state of West Virginia. One AA includes Wood County, WV. Wood County is part of a metropolitan statistical area (MSA). The other AA includes all of three contiguous counties that are not included in a MSA. These counties include Wetzel, Tyler, and Pleasants counties.

Wood County is part of the Parkersburg-Vienna, WV MSA #37620 (Parkesburg MSA). The Parkersburg MSA includes the West Virginia counties of Wood and Wirt. These are the only 2 counties in the Parkersburg MSA. Wirt County is not in Doolin's AA because the bank does not have any offices or deposit taking locations in Wirt County. Wood County is the only county included in Doolin's Parkersburg AA.

Wetzel, Tyler, and Pleasants counties are not located in an MSA and are more rural than Wood County. Wetzel, Tyler, and Pleasants counties are contiguous counties in northwestern West Virginia. All 3 of these contiguous counties are south of the State's northwestern panhandle and border the Ohio River to the west. These 3 counties comprise the Tri-County AA.

There are 26 census tracts in the Parkersburg AA and 10 census tracts in the Tri-County AA, for a total of 36 census tracts within both AAs. The total population in both AAs was 120,352 according to the 2010 U.S. Census. Tables 3a and 3b illustrate demographic information for both of the Doolin's AAs.

Parkersburg MSA AA:

| Table 3a - Demographic Information for Full Scope Area: Doolin (Parkersburg AA) | | | | | | |
|--|--------|-------------------------|---|---------------|-----------------------------------|------------|
| Demographic Characteristics | # | Low % of # | Moderate % of # | Middle % of # | Upper % of # | NA* % of # |
| Geographies (Census Tracts/BNAs) | 26 | 0.00 | 19.23 | 65.38 | 15.38 | 0.00 |
| Population by Geography | 86,956 | 0.00 | 15.81 | 70.92 | 13.26 | 0.00 |
| Owner-Occupied Housing by Geography | 26,575 | 0.00 | 12.53 | 72.78 | 14.69 | 0.00 |
| Business by Geography | 5,043 | 0.00 | 23.24 | 63.32 | 13.44 | 0.00 |
| Farms by Geography | 152 | 0.00 | 13.16 | 77.63 | 9.21 | 0.00 |
| Family Distribution by Income Level | 23,934 | 20.58 | 16.48 | 23.38 | 39.56 | 0.00 |
| Distribution of Low and Moderate Income Families throughout AA Geographies | 8,871 | 0.00 | 22.33 | 68.03 | 9.64 | 0.00 |
| Median Family Income HUD Adjusted Median Family Income 2015 Households Below Poverty Level | | 51,627 56,300 16% | Median Housing Value: National Unemployment**: WV State Unemployment**: Parkersburg AA Unemployment**: | | \$102,885 4.9% 6.2% 6.0% | |

Source: 2010 US Census and 2015 HUD updated MFI

(*) The NA category consists of geographies that have not been assigned an income classification.

(**) Unemployment rates are from the U.S. Bureau of Labor Statistics as of September 2015. Unemployment rates are not seasonally adjusted because seasonally adjusted unemployment data for all counties in the AA was not available. Therefore, unseasonably adjusted data was used throughout to maintain a consistent comparison.

The Parkersburg AA includes 26 census tracts. The number of census tracts decreased by 1 census tract since the last performance evaluation. Two census tracts were removed and 1 census tract was added in the Parkersburg AA because of changing population densities. No census tracts were noted as distressed or underserved in 2015. The Parkersburg AA delineation complies with all regulatory requirements and does not arbitrarily exclude low- or moderate-income areas. The AA was delineated by including whole geographies in which Doolin has its branch locations. There are no low-income census tracts and five moderate-income census tracts in the AA.

The Parkersburg AA population of 86,956 is higher than the Tri-County AA population of 33,396 as of the 2010 U.S. Census. Economic conditions in the Parkersburg AA, measured by unemployment rate, median family income levels, and poverty rate, remain better than the Tri-County AA. Outlooks on employment and median household income are tepid for all of the Parkersburg AA. The business climate will limit economic expansion. A weak coal industry, low energy prices, and an aging workforce are factors limiting economic growth. There is a strong reliance on chemical manufacturing within the Parkersburg AA. The largest employer in the

Parkersburg AA is a chemical company that is experiencing financial and legal risks. Population forecasts per Moody's Analytics predict a stable population through 2020 in the Parkersburg AA.

Unemployment rates vary between the two AAs. As of September 2015, the Parkersburg AA rate of 6.0 percent is higher than the national unemployment rate of 4.9 percent but better than the Tri-County AA unemployment rate of 8.8 percent. The West Virginia state unemployment rate was comparable at 6.2 percent for the same period. All unemployment rates aforementioned are not seasonally adjusted. Seasonally adjusted unemployment data specific to each county in both AAs was not available. According to Moody's Analytics as of July 2015, future job growth is expected to grow 8.4 percent to 46.5 thousand jobs from 2015 to 2020 in the Parkersburg AA. In addition, Moody's is forecasting decreasing unemployment and median household income growth of 18.7 percent to \$51.5 thousand in the same period.

Major employers in the Parkersburg AA include The Chemours Company, Camden Clark Memorial Hospital, GE Advanced Materials, and Mountain State Blue Cross and Blue Shield. The dominant sectors of employment concentration in the Parkersburg AA are retail trade, education and health services, government, and professional and business services.

The median cost of housing in the Parkersburg AA is \$103 thousand. The updated HUD Median Family Income for 2015 is \$56.3 thousand. The percentage of households below the poverty level is 16 percent. The AA's population is comprised of 23,934 families. Income distribution among the families in the AA includes 20.6 percent low-income and 16.5 percent moderate-income.

In 2014, 65 lenders originated loans in the Parkersburg AA. Doolin ranked 58th in the AA, originating 2 loans for \$163 thousand, with a market share of 0.1 percent by loan count. Competition in the AA was strong and dominated by larger lenders with more market share and resources. Peoples Bank, Community Bank of Parkersburg, and United Bank rank as the first through third place lenders with market shares of 10.1 percent, 8.7 percent, and 8.0 percent, respectively. Other competitors consisted of larger national and regional banks, other small community banks, and non-bank mortgage companies such as Quicken Loans (fourth place lender with 6.9 percent market share).

According to the June 30, 2014 FDIC Summary of Deposits Market Share Report, Doolin ranked 10th out of 10 banks for total deposits in the Parkersburg AA. Doolin claimed 0.5 percent or \$7.9 million of the total deposits with one office in the AA. United Bank ranked first with 5 offices and 34.6 percent of the deposits. Other financial institutions include WesBanco Bank with 4 offices and 15.0 percent of the deposits, BB&T with 4 offices and 13.9 percent of the deposits, and Community Bank of Parkersburg with 4 offices and 11.2 percent of the deposits.

As part of the evaluation process, we completed community contact interviews. We contacted a community-based organization located in the Parkersburg AA. The organization serves 11 counties in western and central West Virginia. The organization's mission is to empower

families and strengthen communities by providing leadership, education, resources, and opportunities that improve quality of life. The organization promotes a home-ownership program where it builds and sells new homes to low- and moderate-income individuals and families. Local financial institutions provide the financing for the first lien mortgage and the organization provides the down payment funded by state grant money. The contact noted demand is strong and participation from local financial institutions is good. The contact specifically mentioned Doolin with positive comments because of the bank’s active participation in the program and donations the bank gives to the organization.

Tri-County Non-MSA AA:

| Table 3b - Demographic Information for Full Scope Area: Doolin (Tri-County AA) | | | | | | |
|--|--------|-------------------------|--|---------------|----------------------------------|------------|
| Demographic Characteristics | # | Low % of # | Moderate % of # | Middle % of # | Upper % of # | NA* % of # |
| Geographies (Census Tracts/BNAs) | 10 | 0.00 | 0.00 | 70.00 | 30.00 | 0.00 |
| Population by Geography | 33,396 | 0.00 | 0.00 | 72.98 | 27.02 | 0.00 |
| Owner-Occupied Housing by Geography | 10,718 | 0.00 | 0.00 | 76.80 | 23.20 | 0.00 |
| Business by Geography | 1,439 | 0.00 | 0.00 | 68.73 | 31.27 | 0.00 |
| Farms by Geography | 54 | 0.00 | 0.00 | 59.26 | 40.74 | 0.00 |
| Family Distribution by Income Level | 8,984 | 16.92 | 16.93 | 20.08 | 46.07 | 0.00 |
| Distribution of Low and Moderate Income Families throughout AA Geographies | 3,041 | 0.00 | 0.00 | 80.86 | 19.14 | 0.00 |
| Median Family Income HUD Adjusted Median Family Income 2015 Households Below Poverty Level | | 43,503 48,900 17% | Median Housing Value: National Unemployment**: WV State Unemployment**: Tri-County AA Unemployment**: | | \$82,200 4.9% 6.2% 8.8% | |

Source: 2010 US Census and 2015 HUD updated MFI

(*) The NA category consists of geographies that have not been assigned an income classification.

(**) Unemployment rates are from the U.S. Bureau of Labor Statistics as of September 2015. Unemployment rates are not seasonally adjusted because seasonally adjusted unemployment data for all counties in the AA was not available. Therefore, unseasonably adjusted data was used throughout to maintain a consistent comparison.

The Tri-County AA contains 10 census tracts. The number of census tracts is unchanged in the AA since the last performance evaluation. FFIEC Census Reports indicate 4 census tracts in the Tri-County AA as distressed or under-served in 2015. All 4 census tracts are middle-income tracts and are located in Wetzel County.

The Tri-County AA delineation complies with all regulatory requirements and does not arbitrarily exclude low- or moderate-income areas. The AA was delineated by including whole geographies in which Doolin has its branch location. There are no low-income or moderate-income census tracts in the AA.

The Tri-County AA population of 33,396 is lower than the Parkersburg AA of 86,956 as of the 2010 U.S. Census. While Parkersburg AA population forecasts expect a stable population through 2020, population forecasts in the Tri-County AA for the same period are mixed based on county. Per the West Virginia University Bureau of Business and Economic Research (WVU), Wetzel County is expected to experience a population decline of more than 0.5 percent. WVU also estimates slight population expansion for Tyler and Pleasants Counties of zero to 0.5 percent in the same period.

Unemployment rates vary between the 2 AAs. As of September 2015, the Tri-County AA rate of 8.8 percent was higher than the national unemployment rate of 4.9 percent, the Parkersburg AA rate of 6.0 percent, and the West Virginia state unemployment rate of 6.2 percent for the same period. All unemployment rates aforementioned are not seasonally adjusted for the same reason as described in the description of the Parkersburg AA. Unemployment outlooks for the Tri-County AA through 2020 are positive and similar to the outlook for the Parkersburg AA. Per WVU, Wetzel and Tyler County are forecasted to experience annual employment growth greater than 1 percent. Pleasants County is expected to experience a 0.5 percent to 1 percent annual employment growth in the same period. Much of the employment growth is attributed to oil and gas production in this area of West Virginia to offset some of the declines in manufacturing industry.

Major industries for employment in the Tri-County AA include educational services, healthcare, social assistance, and manufacturing. Top employers in the AA include per the West Virginia Department of Commerce include county specific Boards of Education, Wal-Mart, First Energy, and Momentive Performance Materials USA.

The median cost of housing in the AA is \$82,200. The HUD Median Family Income for 2015 is \$48.9 thousand. The percentage of households below the poverty level is at 17 percent. The AA's population is comprised of 8,984 families. Income distribution among the families in the AA includes 16.9 percent low-income and 16.9 percent moderate-income.

In 2014, 27 lenders originated HMDA loans in the AA, according to the HMDA Peer Mortgage Data report. Doolin originated 4 HMDA reportable loans in 2014 but none were originated in the Tri-County AA. Competition in the AA was significant but less fierce than in the Parkersburg AA. Other larger lenders including Wesbanco Bank, Prime Lending, JP Morgan Bank, and US Bank ranked first through fourth by loan count with market shares of 17.2 percent, 13.3 percent, 9.4 percent, and 7.8 percent respectively.

According to the June 30, 2015 FDIC Summary of Deposits Market Share Report, Doolin ranked stronger in the Tri-County AA than the Parkersburg AA for deposit share. Doolin ranked

fifth out of seven institutions in the Tri-County AA with 6.1 percent of total deposits. The top 3 financial institutions included Wesbanco Bank with 5 offices and 28.0 percent of the deposits, Union Bank with 5 offices and 27.4 percent, and Peoples Bank with 3 offices and 18.0 percent of total deposits.

Our second community contact interview involved a local organization in the Tri-County AA. The organization's mission is to create an awareness of existing opportunities and assets in the local area to promote membership, community engagement, and economic growth. The contact stated that there are opportunities for financial institutions to participate in community development projects, specifically financing projects to provide more affordable housing for low- and moderate-income individuals and families. In addition, the contact indicated the desire for banks to assist local education and training centers to fund training programs that develop the local workforce for jobs in the energy industry. The oil and gas drilling boom has created a gap in existing housing supply and local jobs because of the transient workforce that extracts the natural resources. The contact noted that experiences with local financial institutions were limited, but the contact was not aware of any negative perception of financial institutions in the local area.

Conclusions with Respect to Performance Criteria

Lending Test

Doolin's performance under the lending test is satisfactory when considering performance context. The LTD ratio is reasonable with internal and external factors influencing the ratio. A substantial majority of the bank's home mortgage loans originated within the AAs. Doolin's record of originating loans reflected reasonable distribution among borrowers of different income levels. Doolin's record of originating loans reflected reasonable distribution among AA geographies.

Loan-to-Deposit Ratio

The LTD ratio is reasonable with internal and external factors influencing the ratio. The LTD ratio is low and exhibits limited re-deployment of deposited funds into loans. Internal and external factors in the bank's performance context explain the reasons for a low LTD ratio and include strong competition, weak overall economy, high poverty rates, low deposit market share, and Doolin's limited loan product offering as a small mutual thrift. Despite the low LTD ratio, the LTD ratio is reasonable given Doolin's performance context. Additionally, Doolin hired a new Director of Lending in March 2015 in efforts to increase lending.

Doolin's ten-quarter average LTD ratio was 23.5 percent for the period from January 1, 2013 through June 30, 2015. The LTD ratio ranged from a high of 27.4 percent, as of September 30, 2013, to a low of 19.4 percent as of March 31, 2015. During the same period, 4 other institutions headquartered in Doolin's AAs had a ten-quarter average LTD ratio of 71.7 percent. It should be noted that the 4 other institutions are all significantly larger in terms of total assets;

however, they are the best available for comparison because of their locations in the bank's AAs. A significant internal factor for Doolin's low LTD ratio is that Doolin does not offer commercial loans while all 4 banks in the LTD ratio comparison offer these products. Commercial loans are generally larger dollar loans that would support a higher LTD ratio. The larger institutions have greater capacity, resources, and product offerings to originate more loans compared to Doolin and hence have a larger LTD ratio. Doolin's 23.5 percent ten-quarter average LTD ratio is lower than the seven-quarter average LTD ratio of 31.5 percent reported in the prior CRA evaluation as of September 20, 2010.

The oil and gas boom in Doolin's AAs has been a significant contributor to the decline in the LTD ratio since the prior CRA evaluation. Landowners have been using windfall cash payments from energy company oil and gas leases to pay down existing debt and increase deposits. The on-going lease payments for select landowners have lessened traditional credit needs from banks. In addition, excess cash from on-going lease payments have increased bank deposits. Lastly, deterioration in the local domestic manufacturing economy during the most recent recession contributes to lower loan demand from consumers.

Lending in the Assessment Area

Doolin originates a substantial majority of its loans inside both of its AAs. The bank's lending concentration inside the AAs demonstrates its commitment to serving its AAs. The level of lending inside the AAs exceeds the standard for satisfactory performance in this criterion.

Doolin's primary loan products consist of residential mortgage loans. We evaluated Doolin's record of originating residential mortgages over the period between January 1, 2013 and June 30, 2015. Residential mortgage lending includes home purchase, home improvement, and home-mortgage refinance loans. Table 4 illustrates the total number and dollar amount of HMDA-reportable loans originated inside and outside both AAs during the 30-month review period ending June 30, 2015. For comparison purposes, the table reflects lending activity by number and dollar amount during the review period.

Combined AAs: Parkersburg AA and Tri-County AA

| Table 4 - Concentration of HMDA-Reportable Loans* In and Outside of the Reviewed Assessment Areas | | | | | |
|--|--------------------------------|----------|---------------------------------|----------|-------------------------|
| 1/1/2013 – 6/30/2015 | | | | | |
| (Dollars in thousands) | | | | | |
| Period By Year | Inside Assessment Areas | | Outside Assessment Areas | | Total HMDA Loans |
| By Number: | # | % | # | % | # |
| 1/1/13 – 6/30/15 | 20 | 83.3 | 4 | 16.7 | 24 |
| By \$ Amt.: | \$ | % | \$ | % | \$ |
| 1/1/13 – 6/30/15 | \$1,849 | 87.1 | \$275 | 12.9 | \$2,124 |

* Percent based on total HMDA-reportable loans originated during applicable period.

Loans originated by the bank in both AAs decreased since the previous evaluation period, but is still a substantial majority. Doolin’s originated loans in the AAs were 83.3 percent in the current evaluation period compared to 97.8 percent in the prior evaluation period. The percentage of loan volume made inside the AAs also decreased since the prior period. The dollar amount of loans originated in the AAs was \$1.8 million during the current evaluation period, or 87.1 percent of loans originated in the AAs by dollar amount. The dollar amount of loans originated during the prior evaluation period was \$3.8 million, or 98.6 percent of loans originated in the AAs by dollar amount.

Lending to Borrowers of Different Incomes

Doolin’s record of originating loans reflected reasonable distribution among borrowers of different income levels. As part of our lending analysis, we reviewed the proportion of loans to borrowers of different income levels within each AA. Table 5a and Table 5b illustrate loan originations, categorized by borrower income level as reported by Doolin during the review period. The table also compares this activity to 2014 aggregate lender data (most recent data available).

Parkersburg AA:

| Table 5a Borrower Distribution of Residential Real Estate Loans in AA | | | | | | | | | | | | |
|--|------------------|-----------------------|-------------|------------------|-----------------------|-------------|------------------|-----------------------|-------------|------------------|-----------------------|-------------|
| Borrower Income Level | Low | | | Moderate | | | Middle | | | Upper | | |
| Loan Type | % of AA Families | % of Number of Loans* | Aggregate** | % of AA Families | % of Number of Loans* | Aggregate** | % of AA Families | % of Number of Loans* | Aggregate** | % of AA Families | % of Number of Loans* | Aggregate** |
| Home Purchase | 20.58 | 0.00 | 11.50 | 16.48 | 0.00 | 25.34 | 23.38 | 0.00 | 23.61 | 39.56 | 100.0 | 39.56 |
| Home Improvement | 20.58 | 0.00 | 14.97 | 16.48 | 0.00 | 21.77 | 23.38 | 0.00 | 24.49 | 39.56 | 0.00 | 38.78 |
| Home Mortgage Refinance | 20.58 | 0.00 | 11.02 | 16.48 | 0.00 | 18.57 | 23.38 | 25.00 | 25.10 | 39.56 | 75.00 | 45.31 |

* Source: 2013 – June 2015 HMDA LAR

**Based on 2014 Peer Mortgage Data (USPR)

Doolin did not originate any home purchase, home improvement, or home mortgage refinance loans to low- or moderate-income borrowers in the Parkersburg AA in the review period. As a result, the percentage of these loans Doolin originated is lower than the peer aggregate for each product in the Parkersburg AA. However, the distribution of Doolin’s loans for all 3 products is reasonable performance because of the bank’s performance context.

Several factors contribute to Doolin’s low level of distribution of the loan products in the AA depicted in Table 5a. The main reason is the overall low number of loans Doolin originated in the review period. Doolin only originated 20 home purchase, home improvement, and home refinance loans in both AAs. Of the 20 loans, only five were within the Parkersburg AA.

Significant competition inhibits Doolin’s ability to make loans in the Parkersburg AA. Larger national and regional banks, non-bank mortgage lenders, and credit unions with significantly more market share directly compete with Doolin in the AA. Larger lenders with more capacity and extensive resources offer more aggressive pricing than what Doolin can accommodate because of its size. Many of the larger lenders also have mature First Time Homebuyer programs in which to attract borrowers. In addition, 16 percent of households are below the poverty level. This reduces the 37.1 percent of families that are low- to moderate-income families by income level that may be able to qualify for home ownership. Families living below the poverty level lack the financial wherewithal to meet underwriting criteria for home mortgage loans.

Tri-County AA:

| Table 5b Borrower Distribution of Residential Real Estate Loans in AA | | | | | | | | | | | | |
|--|------------------|-----------------------|--------------|------------------|-----------------------|--------------|------------------|-----------------------|--------------|------------------|-----------------------|--------------|
| Borrower Income Level | Low | | | Moderate | | | Middle | | | Upper | | |
| Loan Type | % of AA Families | % of Number of Loans* | Aggregate ** | % of AA Families | % of Number of Loans* | Aggregate ** | % of AA Families | % of Number of Loans* | Aggregate ** | % of AA Families | % of Number of Loans* | Aggregate ** |
| Home Purchase | 16.92 | 0.00 | 6.80 | 16.93 | 33.33 | 22.33 | 20.08 | 33.33 | 26.21 | 46.07 | 33.33 | 44.66 |
| Home Improvement | 16.92 | 0.00 | 28.57 | 16.93 | 0.00 | 19.05 | 20.08 | 0.00 | 4.76 | 46.07 | 100.0 | 47.62 |
| Home Mortgage Refinance | 16.92 | 12.50 | 6.25 | 16.93 | 0.00 | 20.31 | 20.08 | 0.00 | 23.44 | 46.07 | 87.50 | 50.00 |

* Source: 2013 – June 2015 HMDA LAR

**Based on 2014 Peer Mortgage Data (USPR)

Doolin’s percentage of home purchase and home improvement loans to low-income borrowers is lower than the peer aggregate for the same product in the Tri-County AA. This is because Doolin did not originate any home purchase or home improvement loans to low-income borrowers in the review period. Doolin’s percentage of home mortgage refinance loans to low-income borrowers exceeds the peer aggregate for home mortgage refinance loans. Despite not originating any home purchase or home improvement loans, Doolin’s performance is reasonable performance because of the bank’s performance in the refinance category and overall performance context.

Doolin’s percentage of home purchase loans to moderate-income borrowers exceeds the peer aggregate for home purchase loans. Doolin’s percentage of home improvement loans and home mortgage refinance loans to moderate-income borrowers is lower than the peer aggregate for these 2 products. This is because Doolin did not originate any home improvement loans or home mortgage refinance loans to moderate-income borrowers in the review period. Doolin’s performance is reasonable because of its performance in the home purchase category and overall performance context.

Several factors contribute to Doolin’s lower level of distribution of loan products among low- to moderate-income borrowers in the AA depicted in Table 5b. The main reason is the overall low

number of loans Doolin originated in the review period, which is explainable. Doolin only originated 20 home purchase, home improvement, and home refinance loans inside both AAs. Of the 20 loans, 15 were in the Tri-County AA.

The low overall volume of loans is mostly because of a weak economy in the Tri-County AA. The Tri-County AA has an overall unemployment rate of 8.8 percent. This rate is higher than the unemployment rate for the Parkersburg AA (6.0 percent), the state of West Virginia (6.2 percent), and the national unemployment rate (4.9 percent) as of September 2015 according to the U.S. Bureau of Labor Statistics. Historical industry concentrations in the AA namely include manufacturing, an industry that has been negatively impacted with plant closures and workforce layoffs since the last performance evaluation. Economic growth and new employment opportunities are limited. Competition is also significant from larger national and regional banks with aggressive pricing and extensive resources, although competition is less fierce compared to the Parkersburg AA.

Geographic Distribution of Loans

Doolin’s record of originating loans reflected reasonable distribution among AA geographies. As part of our lending analysis, we reviewed the geographic distribution of loans within each AA. Table 6a and Table 6b illustrate loan originations, categorized by geographies of different income levels in each AA during the evaluation period. The table also compares this activity to 2014 aggregate lender data (most recent data available).

Parkersburg AA:

| Table 6a Geographic Distribution of Residential Real Estate Loans in AA | | | | | | | | | | | | |
|---|----------------------|-----------------------|-------------|----------------------|-----------------------|-------------|----------------------|-----------------------|-------------|----------------------|-----------------------|-------------|
| Borrower Income Level | Low | | | Moderate | | | Middle | | | Upper | | |
| Loan Type | % Owner Occ Units*** | % of Number of Loans* | Aggregate** | % Owner Occ Units*** | % of Number of Loans* | Aggregate** | % Owner Occ Units*** | % of Number of Loans* | Aggregate** | % Owner Occ Units*** | % of Number of Loans* | Aggregate** |
| Home Purchase | 0.00 | 0.00 | 0.00 | 12.53 | 0.00 | 12.45 | 72.78 | 0.00 | 68.30 | 14.69 | 100.0 | 19.26 |
| Home Improvement | 0.00 | 0.00 | 0.00 | 12.53 | 0.00 | 12.90 | 72.78 | 0.00 | 60.65 | 14.69 | 0.00 | 26.45 |
| Home Mortgage Refinance | 0.00 | 0.00 | 0.00 | 12.53 | 0.00 | 10.60 | 72.78 | 75.00 | 71.73 | 14.69 | 25.00 | 17.67 |

*Source: 2013 – June 2015 HMDA LAR

**Based on 2014 Peer Mortgage Data (USPR)

*** Percentage of Owner Occupied Units is the number of owner occupied housing units in a particular geography divided by the number of owner occupied housing units in the area based on 2010 Census Information.

An analysis of Doolin’s geographic distribution of loans in low-income geographies is not feasible because there are no low-income geographies in the Parkersburg AA. Doolin’s distribution of loans to moderate-income geographies is lower than the peer aggregate for home purchase, home improvement, and home refinance loans. Despite not making any loans in moderate-income geographies in the evaluation period, Doolin’s performance is reasonable for multiple reasons. The Parkersburg AA only contains 5 moderate-income geographies or 19.2

percent of 26 geographies. In addition, the limited numbers of moderate-income geographies have a low population density by geography compared to the remaining geographies in the AA. These factors combined with the fact that no low-income geographies exist in the Parkersburg AA limit Doolin's opportunity to make loans in low- and moderate-income geographies in the AA.

Additional performance context factors contribute to Doolin's lower percentage of home purchase, home improvement, and home refinance loans in low- to moderate-income geographies. These factors include significant competition, a weak economy, and financial and capacity limitations given the size of the bank. This performance evaluation provides additional details on these performance context factors in previous sections of this document.

Rental and vacant housing units are prevalent in moderate-income geographies in the Parkersburg AA. This further limits the bank's ability to make loans in moderate-income geographies. The number of rental and vacant units is slightly greater than the number of owner occupied housing units in moderate-income geographies in the Parkersburg AA. No similar comparison can be made for low-income geographies in the Parkersburg AA because there are no low-income geographies in the Parkersburg AA. Only 6,670 or 16.6 percent of 40,270 total housing units in the Parkersburg AA are in moderate-income tracts. Of the 6,670 housing units in moderate-income geographies in the Parkersburg AA, owner occupied units are 49.9 percent. Renter occupied units comprise 37.9 percent and vacant units are 12.2 percent of the total housing units in moderate-income geographies.

Tri-County AA:

| Table 6b Geographic Distribution of Residential Real Estate Loans in AA | | | | | | | | | | | | |
|---|----------------------|-----------------------|-------------|----------------------|-----------------------|-------------|----------------------|-----------------------|-------------|----------------------|-----------------------|-------------|
| Borrower Income Level | Low | | | Moderate | | | Middle | | | Upper | | |
| Loan Type | % Owner Occ Units*** | % of Number of Loans* | Aggregate** | % Owner Occ Units*** | % of Number of Loans* | Aggregate** | % Owner Occ Units*** | % of Number of Loans* | Aggregate** | % Owner Occ Units*** | % of Number of Loans* | Aggregate** |
| Home Purchase | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | 76.80 | 66.67 | 58.27 | 23.20 | 33.33 | 41.73 |
| Home Improvement | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | 76.80 | 100.0 | 81.82 | 23.20 | 0.00 | 18.18 |
| Home Mortgage Refinance | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | 76.80 | 87.50 | 75.00 | 23.20 | 12.50 | 25.00 |

*Source: 2013 – June 2015 HMDA LAR

**Based on 2014 Peer Mortgage Data (USPR)

*** Percentage of Owner Occupied Units is the number of owner occupied housing units in a particular geography divided by the number of owner occupied housing units in the area based on 2010 Census Information.

An analysis of Doolin's geographic distribution of loans in low- and moderate-income geographies is not feasible because there are no low- and moderate-income geographies in the Tri-County AA. This fact prevents Doolin or any other financial institution from originating a loan in a low- to moderate-income geography. Therefore, Doolin's performance in this criterion with aggregate peer mortgage data cannot be assessed.

Responses to Complaints

Doolin did not receive any complaints about its performance in helping to meet credit needs in either AA during this evaluation period. This has a neutral impact on the overall CRA rating.

Fair Lending or Other Illegal Credit Practices Review

Pursuant to 12 C.F.R. 25.28(c), or 12 C.F.R. 195.28(c), in determining a national bank's (bank) or Federal savings association's (FSA) CRA rating, respectively, the OCC considers evidence of discriminatory or other illegal credit practices in any geography by the bank or FSA, or in any assessment area by an affiliate whose loans have been considered as part of the bank's or FSA's lending performance.

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