



LARGE BANK

Comptroller of the Currency
Administrator of National Banks

Washington, DC 20219

Public Disclosure

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Community Reinvestment Act Performance Evaluation

**Belmont National Bank
Charter Number: 14050**

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Office of the Comptroller of the Currency

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NOTE: This evaluation is not, and should not be construed as, an assessment of the financial condition of this institution. The rating assigned to this institution does not represent an analysis, conclusion, or opinion of the federal financial supervisory agency concerning the safety and soundness of this financial institution.

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General Information

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

*This document is an evaluation of the CRA performance of **Belmont National Bank** prepared by the **Office of the Comptroller of the Currency (OCC)**, the institution's supervisory agency, as of **December 30, 2000**. The agency evaluates performance in assessment area(s), as they are delineated by the institution, rather than individual branches. This assessment area evaluation may include the visits to some, but not necessarily all of the institution's branches. The agency rates the CRA performance of an institution consistent with the provisions set forth in Appendix A to 12 CFR Part 25.*

Definitions and Common Abbreviations

The following terms and abbreviations are used throughout this Performance Evaluation. The definitions are intended to provide the reader with a general understanding of the terms, not a strict legal definition.

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

Block Numbering Area (BNA) - Statistical subdivisions of counties in which census tracts have not been established. BNAs have been established by the United States Census Bureau in conjunction with state agencies.

Census Tract (CT) - Small, locally defined statistical areas within metropolitan statistical areas. These areas are determined by the United States Census Bureau in an attempt to group homogenous populations. A CT has defined boundaries per ten year census and an average population of 4,000.

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

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

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

Geography - A census tract or a block numbering area delineated by the United States Bureau of the Census in the most recent decennial census.

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

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

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

Low-Income - Income levels that are less than 50% of the median family income.

Median Family Income (MFI) - The median income determined by the United States Census Bureau every ten years and used to determine the income level category of geographies. Also, the median income determined by the Department of Housing and Urban Development annually that is used to determine the income level category of individuals. For any given area, the median is the point at which half of the families have income above it and half below it.

Metropolitan Statistical Area (MSA) - Area defined by the Director of the United States Office of Management and Budget. MSAs consist of one or more counties, including large population centers and nearby communities that have a high degree of interaction.

Middle-Income - Income levels that are at least 80% and less than 120% of the MFI.

Moderate-Income - Income levels that are at least 50% and less than 80% of the MFI.

Small Business Loans - Loans with original amounts of \$1 million or less that are: (1) secured by nonfarm nonresidential properties; or (2) commercial and industrial loans to U.S. addresses.

Small Farm Loans - Loans with original amounts of \$500 thousand or less that are: (1) secured by farmland; or (2) to finance agricultural production and other loans to farmers.

Tier 1 Capital - The total of common shareholders' equity, perpetual preferred shareholders' equity with noncumulative dividends, retained earnings and minority interests in the equity accounts of consolidated subsidiaries.

Upper-Income - Income levels that are 120% or more of the MFI.

Overall CRA Rating

Institution CRA Rating: This institution is rated "**Satisfactory.**"

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

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

* The Lending Test is weighted more heavily than the Investment and Service Tests when arriving at an overall rating.

The major factors that support this rating include:

- An adequate level of home mortgage loans and small loans to businesses that are responsive to the credit needs of the assessment areas (AAs).
- A substantial majority of home mortgage loans and small loans to businesses are originated within the AAs.
- Good distribution of small loans to small businesses, and a good record of originating small loans for \$100 thousand to businesses in the AAs.
- Adequate distribution of BNB’s loans among geographies and borrowers of different income levels in the multistate MSA.
- Community development lending had a positive impact on addressing credit needs in the multistate MSA.
- The level of CD investments in the AAs is adequate based on the opportunities available and the requirement to increase capital.
- The bank’s service delivery systems are reasonably accessible to geographies and individuals of different income levels in the multistate MSA

Description of Institution

Belmont National Bank (BNB) is a community bank headquartered in Wheeling, West Virginia. BNB is a subsidiary of Belmont Bancorp, a one-bank holding company headquartered in Bridgeport, Ohio. In addition to BNB, the holding company owns Belmont Financial Network, Inc., a non-bank subsidiary. As of December 31, 2000, BNB reported total assets of \$279 million. BNB is an interstate bank with 13 offices serving the Wheeling WV-Ohio Metropolitan Statistical Area (MSA) and Harrison and Tuscarawas counties in Ohio (non-MSA). There has been no merger activity since the previous examination. There are no affiliates for which the bank wants consideration of their activities when evaluating its performance. There are no bank subsidiaries.

BNB is a full service bank that provides a wide range of retail banking services to individuals and small to medium-sized businesses. The bank provides deposit services, business and personal loans, credit cards, residential mortgage loans, home equity loans, and other consumer oriented financial services. Lending strategies targeted business lending during the evaluation period. As of December 31, 2000, net loans represent 44 percent of total assets and consist of commercial loans and commercial real estate loans (66 percent), home mortgage loans (31 percent), and consumer loans (3 percent). Tier I capital totaled \$19.1 million.

In 1999 and 2000, BNB experienced significant loan problems which required them to increase capital and make staff changes at the senior management level. These regulatory issues have affected the bank's lending performance during the evaluation period.

BNB was rated "Satisfactory" at its last CRA evaluation dated July 10, 1996.

Scope of the Evaluation

Evaluation Period/Products Evaluated

The evaluation period for the Lending Test is January 1, 1996 through December 31, 2000. The evaluation period for the Investment Test and Service Test is July 11, 1996 through January 24, 2001.

Originations of home purchase loans, home improvement loans, home mortgage refinance loans, and small loans to businesses and CD loans were evaluated for the Lending Test. The origination of small loans to farms was not evaluated because the volume was not significant enough to perform a meaningful analysis. The 1999 HMDA Peer data is used in the standard tables for market share analysis.

Data Integrity

An evaluation of BNB's publicly filed information on home mortgage loans, small loans to businesses and small loans to farms was performed on November 4, 2000. The test included an evaluation of the bank's processes to ensure that data is reliable. No significant errors were found in the reported data that was reviewed. This evaluation is therefore based on accurate data.

Selection of Areas for Full-Scope Review

BNB has two AAs. Both the Wheeling, W. Virginia-Ohio multistate metropolitan statistical area (MSA) 9000 and the Ohio nonmetropolitan statistical area (non-MSA) AAs were selected for review. Refer to the "Scope" section under each State rating for details regarding how the areas were selected.

Ratings

The bank's overall rating is a blend of the multistate MSA AA and the non-MSA AA ratings. More weight was placed on the multistate MSA AA, as more than 70% of the bank's deposits, loans, and branch offices are in the multistate MSA AA. Small loans to businesses were weighted more than home mortgage loans based on the volume of loan originations during the evaluation period.

Fair Lending Review

An analysis of 1999 HMDA data, public comments and consumer complaint information was performed according to the OCC's risk-based fair lending approach. Based on its analysis of the information, the OCC decided that a comprehensive fair lending examination would not need to be conducted in connection with the CRA evaluation this year. The latest comprehensive fair lending exam was performed June 10, 1996.

Multistate Metropolitan Area Rating

CRA Rating for the Wheeling, W. Virginia-Ohio MSA 9000¹: Satisfactory

The Lending Test is rated: Low Satisfactory

The Investment Test is rated: Low Satisfactory

The Service Test is rated: Low Satisfactory

The major factors that support this rating include:

- The bank demonstrates an adequate level of responsiveness to the credit needs of the AA.
- The geographic distribution of home mortgage loans and small loans to businesses is adequate.
- Adequate distribution among borrowers of different income levels throughout the AA.
- Community development (CD) lending has a positive effect on the Lending Test rating.
- The level of CD investments is adequate based on the limited opportunities and the requirement to increase capital.
- The bank's service delivery systems are reasonably accessible to geographies and individuals of different income levels. The level of CD services offered is adequate given the limited opportunities in the AA.

Description of Institution's Operations in Wheeling, W. Virginia-Ohio MSA 9000

Refer to the Market Profile for the Wheeling, W. Virginia-Ohio MSA 9000 in Appendix C for detailed demographics and other performance context information.

LENDING TEST

Lending Activity

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

Refer to Table 1 in the Wheeling, W. Virginia-Ohio MSA 9000 section of Appendix D for the facts and data used to evaluate the bank's lending activity.

BNB demonstrates an overall adequate level of responsiveness to the credit needs of the community. There were 1,869 loans totaling \$143 million originated in the AA during the evaluation period. The loans originated represented 72 percent of the total loans reviewed during the evaluation period. The bank's lending focus during the evaluation period was business loans. Sixty percent of the loans originated in the AA during the evaluation period were small loans to businesses. Forty percent of the loans originated were home mortgage loans.

Lending declined significantly in 1999 as a result of issues discussed in the "**Description of Institution**" section of this report. Net loans, in the AA, declined 22 percent during the 12-month period ending December 31, 1999. Small loans to businesses declined 57 percent. Home purchase loans, home improvement loans, and home mortgage refinance loans declined 72 percent, 50 percent, and 34 percent, respectively.

BNB is ranked 5th in terms of deposits with a market share of 9.26 percent. Seventy-eight percent of the bank's deposits are in the assessment area. The bank is ranked 22nd in the origination of home purchase loans with a market share of 1.15 percent. The bank is ranked 14th in the origination of home improvement loans with a market share of 1.29. The bank is ranked 13th in the origination of home mortgage refinance loans with a market share of 1.98 percent. The bank is ranked 4th in the origination of small business loans in the AA with a market share of 9.18 percent.

Market shares are based on 1999 HMDA peer data. As discussed under the description of the institution BNB experienced problem loans that required additional capital which affected its lending activities in 1999. We considered these issues in our analysis. Additionally, there is strong competition in the AA, refer to the Market Profile Appendix C.

Distribution of Loans by Income Level of the Geography

The distribution of home mortgage loans and small loans to businesses by income level of the geography is adequate. Lending opportunities for home mortgage lending in low- and moderate-income geographies are limited. Ninety-four percent of all owner-occupied units in the AA are in middle- and upper-income geographies. Lending competition is strong in the AA.

Home Mortgage Loans

Refer to Tables 2, 3 and 4 in the Wheeling, W. Virginia-Ohio MSA 9000 section of Appendix D for the facts and data used to evaluate the geographic distribution of the bank's home mortgage loan originations.

The overall geographic distribution of home mortgage loans is adequate. The percentage of owner-occupied units in the low-income geography is 0.25 percent. This represents 114 owner-occupied units. The percentage of owner-occupied units in the moderate- income geographies is also low at 5.74 percent. This represents 2,613 owner-occupied units. Additionally, there is strong competition for home mortgage loans. Refer to the Market Profile Appendix C-1.

There is no market share or a low percentage of market shares in low-and moderate-income geographies for home mortgage lending. Market share is based on 1999 HMDA peer data. As discussed under the description of institution the bank experienced loan problems in 1999. A market share analysis by the income level of the geographies is less meaningful and is not discussed in geographic distribution for home mortgage loans.

The geographic distribution of home purchase loans is adequate. The distribution of home purchase loans originated in the low- income geography exceeded the percentage of owner-occupied units in the geography. The distribution of home purchase loans originated in moderate-income geographies is below the percentage of owner-occupied units in the geographies.

The geographic distribution of home improvement loans is adequate. There were no home improvement loans originated in the low-income geography during the evaluation period. The distribution of home improvement loans in moderate-income geographies is below the level of owner-occupied units in the geographies.

The geographic distribution of home mortgage refinance loans is adequate. There were no home mortgage refinance loans originated in the low-income geography. The distribution of home mortgage refinance loans in moderate-income geographies is below the level of owner-occupied units in the geographies.

Small Loans to Businesses

Refer to Table 5 in the Wheeling, W. Virginia-Ohio MSA 9000 section of Appendix D for the facts and data used to evaluate the geographic distribution of the bank's origination of small loans to businesses.

The geographic distribution of small loans to businesses is adequate. The distribution of small loans to businesses in the low-income geography is near the percentage of businesses in the low-income geography. The percentage of small loans to businesses in the moderate-income geographies is below the percentages of businesses in those geographies. The market share of small loans to businesses in moderate-income geographies is below its overall market share of small loans to businesses. No market share is reflected in low-income geographies. Market share data is based on 1999 HMDA peer data.

Lending Gap Analysis

We conducted an analysis to identify gaps in the geographic distribution of the loans under review. Reports detailing geographies with no lending activities were reviewed. There were no unexplained lending gaps.

Inside/Outside Ratio

A substantial majority of home mortgage loans and small loans to businesses originated by BNB over the evaluation period were within the AAs. Total loans reviewed for the evaluation period were used to determine the percentage of loans originated within the AAs. The analysis was conducted at the bank level.

Eighty-three percent of all home mortgage loans and small loans to businesses were within the AAs. Ninety-two percent of the bank's home mortgage loans were originated within the AAs.

Home mortgage loan percentages within of the AAs are as follows: home purchase loans (90 percent), home improvement loans (94 percent), and home mortgage refinance loans (94 percent). Seventy-five percent of small loans to businesses were originated within the AAs.

Distribution of Loans by Income Level of the Borrower

The distribution of home mortgage loans and small loans to businesses by income level of the borrower is adequate.

Home Mortgage Loans

Refer to Tables 7, 8 and 9 in the Wheeling, W. Virginia-Ohio MSA 9000 section of Appendix D for the facts and data used to evaluate the borrower distribution of the bank's home mortgage loan originations.

The distribution of home mortgage loans by the income level of the borrower is adequate. We considered, in our analysis, the difficulty that a low-income person has in affording a home in the AA. The median housing cost is \$43,000. A low-income person earns less than \$18,550. Additionally, approximately 17% of the households in the AA are below the poverty level.

The distribution of home purchase loans by the income level of borrowers is adequate. The percentage of home purchase loans to low- and moderate- income borrowers is below the percentage of low- and moderate- income families in the AA. The market share of home purchase loans to low- and moderate-income borrowers is below the bank's overall market share of home purchase loans.

The distribution of home improvement loans by the income level of borrowers is adequate. The affordability for home purchase loans discussed above limits the opportunities for home improvement loans to low-income borrowers. The percentage of home improvement loans to low-income borrowers is below the percentage of low-income families in the AA. The percentage of home improvement loans to moderate-income borrowers is near the percentage of moderate-income families. The market share of home improvement loans to low-income borrowers is below the bank's overall market share of home improvement loans. The market share of home improvement loans to moderate-income borrowers exceeds the bank's overall market share of home improvement loans.

The distribution of home mortgage refinance loans by the income level of borrowers is adequate. The affordability for home refinance loans discussed above limits the opportunities for home refinance loans to low-income borrowers. The percentage of home mortgage refinance loans to low-income and moderate-income borrowers is below the percentage of low-income and moderate-income families in the AA. The market shares to low-and moderate-income borrowers substantially meet the bank's overall market share.

Small Loans to Businesses

Refer to Table 10 in the Multistate Metropolitan Area(s) section of Appendix D for the facts and data used to evaluate the borrower distribution of the bank's origination of small loans to businesses.

The borrower distribution of small loans to businesses is good. The percentage of small loans to small businesses (businesses with revenues of \$1 million or less) substantially meets the percentages of small businesses in the AA. The bank's market share of small loans made to small businesses exceeds its overall market share for small loans to all businesses. The portion of loans \$100,00 or less substantially meet the portion of businesses that are defined as small in the AA.

Community Development Lending

Refer to Table 1 in the Wheeling, W. Virginia-Ohio MSA 9000 section of Appendix D for the facts and data used to evaluate the bank's level of community development lending.

CD lending had a positive impact on the Lending Test rating, and is responsive to the identified needs in the AA. The bank originated a loan for \$1.785 million to construct 38 units of affordable housing in Barnesville, Ohio. Financing for the development is supported by low-income housing tax credits (LIHTC). The development will provide affordable housing for low- and moderate-income individuals.

Product Innovation and Flexibility

Product Innovation and flexibility had a neutral impact on the lending test rating. BNB did not originate any loans under proprietary lending programs that are considered to be innovative or flexible. The bank introduced affordable mortgage loan products in late 2000. The products are known as the "BNB 97" and "Affordable Gold". The products target low- and moderate-income borrowers. There were no loans originated under the programs as of this review.

INVESTMENT TEST

No qualified investments made during the evaluation period. The requirement for the bank to increase capital has limited its capacity to make qualified investments. Additionally, It was determined through our internal resources, community contacts, and discussions with bank management that there are limited opportunities for qualified investments in the AA. An opportunity to invest in a community development corporation (CDC) sponsored by a local economic development corporation was identified. Competition for qualified investments in the AA is strong.

SERVICE TEST

Retail Banking Services

Refer to Table 13 in the Wheeling, W. Virginia-Ohio MSA 9000 section of Appendix D for the facts and data used to evaluate the distribution of the bank's branch delivery system and branch openings and closings.

BNB's service delivery systems are reasonably accessible to geographies and individuals of different income levels in the AA. The bank operates 9 full service branches. There are no branches located in low- or moderate-income geographies. Less than one percent of the population, representing less than 1,590, resides in low-income geographies. Eight percent (12,931 residents) of the population are in moderate-income geographies.

One of the branches located in a middle-income geography is in close proximity to a moderate-income geography. There were 3 branches opened during the evaluation period that increased the accessibility of delivery systems in middle- and upper-income geographies. BNB closed one branch in a middle-income geography. The bank operates 6 automated teller machines (ATMs) in the AA. None of the ATMs are located in low- or moderate-income geographies.

The business hours offered at the branches are good. Business hours do not vary in a way that inconveniences any portion of the AA. All of the branches in the AA have Saturday hours. Services offered do not vary among branches.

Community Development Services

The level of community development services is considered to be adequate. There are limited opportunities in the AA to partnership with community-based organizations or other entities to provide CD services.

Bank staff serves as instructors for the Community Homebuyer Investment Program (CHIP). CHIP is a multi-county organization that develops and implements training and outreach programs for low- and moderate-income individuals. CHIP is considered a central starting point for potential home ownership applicants within the AA. Successful completion of the program allows applicants to take advantage of local housing-related funding programs.

State Rating

CRA Rating for Ohio²:	<u>Satisfactory</u>
The Lending Test is rated:	<u>High Satisfactory</u>
The Investment Test is rated:	<u>Low Satisfactory</u>
The Service Test is rated:	<u>High Satisfactory</u>

The major factors that support this rating include:

- The bank demonstrates an adequate level of responsiveness to the credit needs of the AA.
- The geographic distribution of home mortgage loans and small loans to businesses is good.
- The distribution of home mortgage loans and small loans to businesses by the income level of the borrowers is good.
- The bank's service delivery systems are readily accessible to geographies and individuals of different income levels in the AA.
- The level of community development investments is adequate based on the opportunities available, and the requirement to increase capital.

Description of Institution's Operations in Ohio

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

Scope of Evaluation in Ohio

The Ohio non-MSA AA received a full scope review. The rating for the State of Ohio is based on the results of a full scope review of the Ohio non-MSA AA. One community contact was held with nonprofit economic development agency. There is a primary need for economic development funding. However, state-sponsored economic programs are used extensively. There were no identified CD investment

² For institutions with branches in two or more states in a multistate metropolitan area, this statewide evaluation does not reflect performance in the parts of this state contained within the multistate metropolitan area. Refer to the multistate metropolitan area rating and discussion for the rating and evaluation of the institution's performance in that area.

opportunities in the AA.

LENDING TEST

Conclusions for Areas Receiving Full-Scope Reviews

The bank's performance under the Lending Test in Ohio is rated "High Satisfactory". Based on full-scope reviews, the bank's performance in the Ohio non-MSA is good.

Lending Activity

Refer to Table 1 in the State of Ohio section of Appendix D for the facts and data used to evaluate the bank's lending activity.

BNB demonstrated an adequate level of responsiveness to the credit needs of the community. There were 725 loans totaling \$58 million originated in the AA during the evaluation period. The total loans originated represented 28 percent of the loans reviewed during the evaluation period. The bank ranked 6th in deposits with a market share of 6.98 percent. Two banks with over \$1 billion in assets have a combined deposit market share of 30 percent. Fifty-seven percent of the loans originated in the AA are home mortgage loans. Forty-two percent of the loans originated are small loans to businesses. One percent of the loans originated is small farm loans.

Lending declined significantly in 1999 as a result of the issues discussed in the "**Description of Institution**" section of this report. Net loans originated in the AA declined 64 percent during the 12-month period ending December 31, 1999. Home mortgage loans declined 64 percent in 1999. Home purchase loans and home mortgage refinancing loans declined 33 percent and 78 percent, respectively, over the same period. Home improvement loans increased 33 percent (from 1 loan to 3 loans). The level of small loans to businesses declined 60 percent.

Market shares are based on 1999 HMDA peer data. As discussed under the description of the institution BNB experienced loan problems that required additional capital which adversely affected its lending activities in 1999. We considered these issues in our analysis. Additionally, there is strong competition in the AA. Refer to Profile in Appendix C.

The bank is the 19th ranked originator of home purchase loans in the AA with 1.48 percent of the market share. The bank is ranked 12th in home improvement loans with 0.94 percent of the market share. The bank is ranked 32nd in home mortgage refinance loans with 0.87 percent of the market share. The bank is ranked 10th in small business loans with 1.63 percent market share.

Distribution of Loans by Income Level of the Geography

The distribution of home mortgage loans and small loans to businesses by income level of the geography is good.

Home Mortgage Loans

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

The overall geographic distribution of home mortgage loans is good. There are no low-income geographies in the AA.

The geographic distribution of home purchase loans is good. The distribution of home purchase loans originated in moderate-income geographies is near the percentage of owner-occupied units in the geographies. The market share in moderate-income geographies exceeds the bank's overall market share.

The geographic distribution of home improvement loans is excellent. The distribution of home improvement loans originated in moderate-income geographies significantly exceeds the percentage of owner-occupied units in the geographies. The market share in moderate-income geographies significantly exceeds the bank's overall market share.

The geographic distribution of home mortgage refinance loans is good. The distribution of home mortgage refinance loans originated in moderate-income geographies is near the percentage of owner-occupied units in the geographies. The market share in moderate-income geographies substantially meets the bank's overall market share.

Small Loans to Businesses

Refer to Table 5 in the State of Ohio section of Appendix D for the facts and data used to evaluate the geographic distribution of the bank's origination of small loans to businesses.

The geographic distribution of small loans to businesses is good. The distribution of small loans to businesses originated in moderate-income geographies is near the percentage of businesses in moderate-income geographies. The market share of small loans to businesses in moderate-income geographies significantly exceeds the bank's overall market share of small loans to businesses.

Lending Gap Analysis

We conducted an analysis to identify gaps in the geographic distribution of the loans under review. Reports detailing geographies with no lending activities were reviewed. There were no unexplained lending gaps.

Inside/Outside Ratio

A substantial majority of home mortgage loans and small loans to businesses originated by BNB over the evaluation period were within the AAs. Total loans reviewed for the evaluation period were used to determine the percentage of loans originated within the AAs. The analysis was performed at the bank level.

Eighty-three percent of all home mortgage loans and small loans to businesses were within the AAs. Ninety-two percent of the bank's home mortgage loans were originated within the AAs.

Mortgage loan products originated inside of the AAs are as follows: home purchase loans (90 percent), home improvement loans (94 percent), and home refinance loans (94 percent). Seventy-five percent of small loans to businesses were within the AAs.

Distribution of Loans by Income Level of the Borrower

The distribution of home mortgage loans and small loans to businesses by the income level of the borrower is good. We considered, in our analysis, the difficulty that a low-income person has in affording a home in the AA. The median housing cost is \$50,700. A low-income person earns less than \$22,650. Additionally, approximately 14% of the households in the AA are below the poverty level.

Home Mortgage Loans

Refer to Tables 7, 8 and 9 in the State of Ohio section of Appendix D for the facts and data used to evaluate the borrower distribution of the bank's home mortgage loan originations.

The distribution of home purchase loans by the income level of the borrower is good. The percentage of home purchase loans to low-income borrowers is less than the percentage of low-income families. The percentage of home purchase loans to moderate-income borrowers exceeds the percentage of moderate-income families. The market share of home purchase loans to low- and moderate-income borrowers exceeds the market share of home mortgage loans.

The distribution of home improvement loans by the income level of the borrower is excellent. The affordability for a low-income person as discussed above limits the opportunities for home refinance lending to low-income borrowers. BNB's

performance is excellent in making home improvement loans to low-income borrowers.

The percentage of home improvement loans to low-and moderate-income borrowers is near to the percentage of low-and moderate-income families. The market share of home improvement loans to low-income borrowers exceeds the market share of home improvement loans. There were no home improvement loans originated to moderate-income borrowers in 1999. There is no market share for home improvement loans to moderate-income borrowers.

The distribution of home mortgage refinance loans by the income level of the borrower is good. The affordability for a low-income person as discussed above limits the opportunities for home refinance lending to low-income borrowers.

The percentage of home mortgage refinance loans to low-income borrowers is below the percentage of low-income families. The percentage of home mortgage refinance loans to moderate-income borrowers is near the percentage of moderate-income families. There were no home mortgage refinance loans originated to low-income borrowers in 1999. There is no market share for home mortgage refinance loans to low-income borrowers. The market share of home mortgage refinance loans to moderate-income borrowers exceeds the market share of home mortgage refinance loans.

Small Loans to Businesses

Refer to Table 10 in the State of Ohio section of Appendix D for the facts and data used to evaluate the borrower distribution of the bank's origination and purchase of small loans to businesses.

The borrower distribution of small loans to businesses is good. The percentage of small loans to small businesses (businesses with revenues of \$1 million or less) substantially meets the percentage of small businesses in the AA. The market share of small loans made to small businesses substantially meets the bank's overall market share for small loans to all businesses. The portion of loans \$100,00 or substantially meets the portion of businesses that are defined as small in the AA.

Community Development Lending

No community development loans were originated in the AA.

Product Innovation and Flexibility

Product Innovation and flexibility had a neutral impact on the lending test rating. BNB did not originate any loans under proprietary lending programs that are

considered to be innovative or flexible. The bank introduced affordable mortgage loan products in late 2000. The products are known as the “BNB 97” and “Affordable Gold”. The products target low- and moderate-income borrowers. There were no loans originated under the programs as of this review.

INVESTMENT TEST

Conclusions for Areas Receiving Full-Scope Reviews

The bank’s performance under the Investment Test in Ohio is rated “Low Satisfactory”. Based on full-scope reviews, the bank’s performance in the Ohio non-MSA is adequate.

No qualified investments were made during the evaluation period. It was determined through our internal resources, community contacts, and discussions with bank management that there are no opportunities for qualified investments in the AA. Additionally, the requirement for the bank to increase capital has limited its capacity to make qualified investments.

SERVICE TEST

Conclusions for Areas Receiving Full-Scope Reviews

The bank’s performance under the Service Test in Ohio is rated “High Satisfactory”. Based on full-scope reviews, the bank’s performance in the Ohio non-MSA is good.

Retail Banking Services

Refer to Table 13 in the State of Ohio section of Appendix D for the facts and data used to evaluate the distribution of the bank’s branch delivery system and branch openings and closings.

BNB’s service delivery systems are readily accessible to geographies and individuals of different income levels in the AA. BNB has 4 branch offices and 2 ATMs in the Ohio non-MSA AA.

The percentage of branch offices and ATMs located in moderate-income geographies significantly exceeds the percentage of population residing in those geographies. Fifty percent of the bank’s branch offices and ATMs are located in moderate-income geographies. Thirty percent of the population in the AA resides in moderate-income geographies. There are no low-income geographies in the AA.

The business hours offered at the branches are good. Business hours do not vary

in a way that inconveniences any portion of the AA. All of the branches in the AA have Saturday hours. Services offered do not vary among branches.

Community Development Services

BNB does not offer any qualified community development services. There are limited opportunities in the AA to partnership with community-based organizations or other entities to provide CD services.

Appendix A: Scope of Examination

The following table identifies the time period covered in this evaluation affiliate activities that were reviewed, and loan products considered. The table also reflects the metropolitan and nonmetropolitan areas that received comprehensive examination review (designated by the term Δ Full-Scope Δ) and those that received a less comprehensive review (designated by the term Δ Limited-Scope Δ).

Time Period Reviewed	Lending Test (excludes CD loans: 01/01/96 to 12/31/00 Investment and Service Tests and CD Loans: 07/11/96 to 01/24/01)	
Financial Institution		Products Reviewed
Belmont National Bank (BNB) St. Clairsville, Ohio		
Affiliate(s)	Affiliate Relationship	Products Reviewed
None	None	None
List of Assessment Areas and Type of Examination		
Assessment Area	Type of Exam	Other Information
Wheeling, W. Va.-Ohio MSA 9000 Ohio Non-MSA	Full Scope for each	None

Appendix B: Summary of Multistate Metropolitan Area and State Ratings

RATINGS BELMONT NATIONAL BANK				
Overall Bank:	Lending Test Rating*	Investment Test Rating	Service Test Rating	Overall Bank/State/Multistate Rating
BELMONT NATIONAL BANK	Low Satisfactory	Low Satisfactory	Low Satisfactory	Satisfactory
Multistate Metropolitan Area:				
Wheeling, W.Va.-Ohio MSA 9000	Low Satisfactory	Low Satisfactory	Low Satisfactory	Satisfactory
State:				
Ohio	High Satisfactory	Low Satisfactory	High Satisfactory	Satisfactory

(*) The Lending Test is weighted more heavily than the Investment and Service Test in the overall rating.

Appendix C: Market Profiles for Full-Scope Areas

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Market Profiles for Areas Receiving Full-Scope Reviews

Wheeling, W. Va.-Ohio MSA 9000	C-2
State of Ohio	C-5

Wheeling, W. Va.-Ohio MSA 9000

Demographic Information for Full-Scope Area: Wheeling, W. Va.-Ohio MSA 9000						
Demographic Characteristics	#	Low % of #	Moderate % of #	Middle % of #	Upper % of #	NA* % of #
Geographies (Census Tracts/BNAs)	50	2.00	16.00	62.00	18.00	2.00
Population by Geography	159,301	0.61	8.12	72.69	18.58	0.00
Owner-Occupied Housing by Geography	45,485	0.25	5.74	74.41	19.60	0.00
Businesses by Geography	4,13	1.97	24.75	50.17	23.10	0.00
Farms by Geography	173	0.00	1.73	83.82	14.45	0.00
Family Distribution by Income Level	44,503	20.23	18.22	21.93	39.62	0.00
Distribution of Low- and Moderate-Income Families throughout AA Geographies	17,112	1.06	10.83	76.77	11.34	0.00
Median Family Income HUD Adjusted Median Family Income for 2000 Households Below the Poverty Level	= \$27,287 = \$37,100 = 16.64%	Median Housing Value Unemployment Rate				= \$42,912 = 5.2%

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

Source: 1990 U.S. Census, and 2000 HUD updated MFI.

The Wheeling, W. Virginia-Ohio MSA ("AA") is comprised of 2 counties in West Virginia (Ohio and Ohio and Marshall counties) and one county in Ohio (Belmont County). The AA meets regulatory requirements and does not arbitrarily exclude low- and moderate-income geographies. Seventy-two percent of the total loans reviewed for the evaluation period were originated in the AA. Seventy-eight percent of the total bank deposits are within the AA. The AA has 50 census tracts, 1 low-income, 8 moderate-income, 31 middle-income, 9 upper-income and 1 no income reported. Strong competition is received from five West Virginia-based banks, including 2 banks with over \$1 billion in assets. BNB's deposit market share as of June 30, 1999 was 9.26 percent. The bank is ranked 3^d in number of branches (9) in the AA.

Housing costs in the AA combined with the high level of poverty make it difficult for low- income borrowers to purchase homes. The median housing value in the AA is \$43,570. The updated median family income for 2000 is \$37,100. The percentage of households below poverty is high at 16.64 percent.

Ohio County (West Virginia) has a population of 50,871. Of the 20 CTs (1 low-income, 4 moderate-income, 10 middle-income, and 5 upper-income) in Ohio County, 18 are in the city of Wheeling, W. Virginia. All of the low- and moderate-

income CTs in Ohio County are in Wheeling. BNB has 2 branches in West Virginia. Both branches are in Wheeling. One of the branches is located in a middle-income CT and the other is located in an upper-income CT. BNB is ranked 7th in terms of deposits in Ohio County with a market share of 6.90 percent. Three larger banks have combined deposit market shares of 44.82 percent. Wheeling is the largest municipality in the AA with a population of 36,520. Between 1980 and 1990 Wheeling experienced a 34 percent population loss. The loss is attributed to the decline of the coal and steel industries.

Wheeling is the recipient of a \$1 million Brownsfields Economic Development Initiative (BEDI) grant from HUD to redevelop its Warehouse District where industrial, manufacturing and commercial facilities now exist as decaying shells. The BEDI provides funds to support economic development projects on sites requiring substance cleanup from abandoned factories and other industrial facilities.

Three community contacts were reviewed. One community contact was conducted during this examination. The contacts were with a housing authority, a nonprofit economic development agency, and a local government agency. All community contacts expressed a primary need of funding for economic development to attract jobs into the area. In the Wheeling area, there is a need for funding to rehabilitate housing for low- and moderate-income households and expanding the supply of affordable housing. Competition to participate in the limited CD lending and investment opportunities is strong.

Marshall County (West Virginia) has 10 census tracts, 2 moderate-income, 5 middle-income, 2 upper-income, and 1 no income reported. Marshall County has a population of 37,356. There are 5 municipalities in Marshall County: Brenwood, McMechen, Glen Dale, Moundsville, and Cameron. The remainder of the county is unincorporated. There are no branches in Marshall County.

Belmont County (Ohio) has the largest population of the three counties in the AA with a population of 71,074. Belmont County is located in the east central portion of Ohio bordering Ohio County, W. Virginia. There are 20 census tracts in the county, 2 moderate-income, 16 middle-income, and 2 upper-income. The bank has 7 branches in Belmont County. The county contains three municipalities classified as cities: Bellaire, Martins Ferry, and St. Clairsville. Barnesville and Shadyside have over 2,500 residents and are villages large enough to be considered urban. The remainder of the county is rural.

Belmont County has undergone a similar transition of its economic base from coal mining, manufacturing, and craft trades to wholesale and retail sales. Most of the remaining jobs in the manufacturing sector are with one employer, Wheeling-Pittsburgh Steel. All of Belmont County is a state-designated Enterprise Zone. Businesses agreeing to retain or create employment and establish, expand,

renovate, or occupy a facility in an Enterprise Zone are eligible for local and state tax incentives. Belmont County will grant up to 50 percent abatement of real estate and or tangible personal property taxes for up to 10 years with additional state incentives available. In the past two years, St. Clairsville has been the center of a retail expansion. A new shopping complex has created many new jobs. The result has been that many retail positions provide lower incomes than positions in manufacturing based operations.

Community contacts were held with an economic development agency and a community action agency to identify credit needs. Credits needs identified were funding for economic development and affordable housing. Opportunities for banks to participate in credit-related projects are moderate. Economic development is supported by an abundance of state-government programs.

State of Ohio Full-Scope Area

Ohio Non-MSA

Demographic Information for Full-Scope Area: Ohio Non-MSA						
Demographic Characteristics	#	Low % of #	Moderate % of #	Middle % of #	Upper % of #	NA* % of #
Geographies (Census Tracts/BNAs)	25	0	28	72	0	0
Population by Geography	100,175	0	29.82	70.18	0	0
Owner-Occupied Housing by Geography	28,618	0	28.51	71.49	0	0
Businesses by Geography	3,875	0	32.21	67.79	0	0
Farms by Geography	310	0	30.32	69.68	0	0
Family Distribution by Income Level	28,368	19.95	20.39	26.94	32.72	0
Distribution of Low- and Moderate-Income Families throughout AA Geographies	11,442	0	37.64	62.36	0	0
Median Family Income HUD Adjusted Median Family Income for 2000 Households Below the Poverty Level	= \$30,562 = \$45,300 = 13.59%	Median Housing Value Unemployment Rate				= \$50,708 = 4.49%

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

Source: 1990 U.S. Census, and 2000 HUD updated MFI.

The Ohio non-MSA is comprised of Harrison and Tuscarawas counties in Ohio. The AA meets regulatory requirements and does not arbitrarily exclude low- and moderate-income geographies. Twenty-eight percent of the total loans reviewed for the evaluation period was originated in the AA. Twenty-two percent of the total bank deposits are within the AA. The majority of the AA is rural with a population of 100,175. The AA has 25 Block Numbering Areas (BNAs), no low-income, 7 moderate-income, 18 middle-income and no upper-income. There is strong competition from three multi-billion dollar banks based in Ohio. Two of those large financial institutions dominate the deposit share with 30 percent of total deposits as of June 30, 1999. BNB is ranked 6th in deposit market share with 6.98 percent. The bank is ranked 3rd (along with three other banks) in the number of branches (4) in the AA.

Housing costs in the AA combined with the high level of poverty make it difficult for low-income borrowers to purchase homes. The median housing value in the AA is \$50,708. The percentage of households below poverty is high at 13.59 percent. The updated median family income for 2000 is \$45,300.

Harrison County is located adjacent to Belmont County. The county has a population of 16,085. There has been a steady decline in population over the last several censuses. There is one branch located in Harrison County in the village of

Cadiz, the largest community in the county. Cadiz is classified as a moderate-income geography. There are 2 moderate-income BNAs and 3 middle-income BNAs in Harrison County.

Government employed the most workers and agriculture was the fastest growing industry. Mining as well as petroleum and gas wells are also important industries to the area. Major employers include: Harrison County government, Harrison Community Hospital, Harrison Hills City Board of Education, and Harrison Mining Corporation.

Tuscarawas County is adjacent to Harrison County. The county has a population of 84,090. BNB has 3 branches located in the city of New Philadelphia, the largest city in the county. There are 5 moderate-income BNAs and 15 middle-income BNAs in the county. The wholesale and retail trade industry employs the most workers. Major employers include: the board of education, Dana Corporation, Genie Company, and Union Hospital.

A community contact was held with a nonprofit economic development agency. No community development lending or investment opportunities for banks were identified. State-sponsored loan programs are used extensively.

Appendix D: Tables of Performance Data

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Content of Standardized Tables D-2

Tables of Performance Data

 Multistate Metropolitan Area(s) D-5

 State of Ohio D-18

Content of Standardized Tables

A separate set of tables is provided for each state. All multistate metropolitan areas are presented in one set of tables. References to the bank include activities of any affiliates that the bank provided for consideration (refer to Appendix A: Scope of the Examination). For purposes of reviewing the Lending Test tables, the following are applicable: purchased loans are treated as originations/purchases; market rank is based on the number of loans originated and purchased by the bank as compared to all other lenders in the MSA/assessment area; and market share is the number of loans originated and purchased by the bank as a percentage of the aggregate number of reportable loans originated and purchased by all lenders in the MSA/assessment area.

The following is a listing and brief description of the tables included in each set:

- Table 1. Lending Volume** - Presents the number and dollar amount of reportable loans originated and purchased by the bank over the evaluation period by MSA/assessment area.
- Table 2. Geographic Distribution of Home Purchase Loans** - Compares the percentage distribution of the number of loans originated and purchased by the bank in low-, moderate-, middle- and upper-income geographies to the percentage distribution of owner-occupied housing units throughout those geographies. The table also presents market rank and market share information based on the most recent aggregate market data available.
- Table 3. Geographic Distribution of Home Improvement Loans** - See Table 2.
- Table 4. Geographic Distribution of Refinance Loans** - See Table 2.
- Table 5. Geographic Distribution of Small Loans to Businesses** - The percentage distribution of the number of small loans (less than or equal to \$1 million) to businesses originated and purchased by the bank in low-, moderate-, middle- and upper-income geographies compared to the percentage distribution of businesses (regardless of revenue size) throughout those geographies. The table also presents market rank and market share information based on the most recent aggregate market data available.
- Table 6. Geographic Distribution of Small Loans to Farms** - The percentage

distribution of the number of small loans (less than or equal to \$500,000) to farms originated and purchased by the bank in low-, moderate-, middle- and upper-income geographies compared to the percentage distribution of farms (regardless of revenue size) throughout those geographies. The table also presents market rank and market share information based on the most recent aggregate market data available.

Table 7. Borrower Distribution of Home Purchase Loans - Compares the percentage distribution of the number of loans originated and purchased by the bank to low-, moderate-, middle- and upper-income borrowers to the percentage distribution of families by income level in each MSA/assessment area. The table also presents market rank and market share information based on the most recent aggregate market data available.

Table 8. Borrower Distribution of Home Improvement Loans - See Table 7.

Table 9. Borrower Distribution of Refinance Loans - See Table 7.

Table 10. Borrower Distribution of Small Loans to Businesses - Compares the percentage distribution of the number of small loans (less than or equal to \$1 million) originated and purchased by the bank to businesses with revenues of \$1 million or less to the percentage distribution of businesses with revenues of \$1 million or less. In addition, the table presents the percentage distribution of the number of loans originated and purchased by the bank by loan size, regardless of the revenue size of the business. Market share information is presented based on the most recent aggregate market data available.

Table 11. Borrower Distribution of Small Loans to Farms - Compares the percentage distribution of the number of small loans (less than or equal to \$500 thousand) originated and purchased by the bank to farms with revenues of \$1 million or less to the percentage distribution of farms with revenues of \$1 million or less. The table also compares the banks percentage distribution with the percentage of loans originated and purchased by all other small farm reporters in the bank AA to farms with revenues of \$1 million or less and is based on the most recent aggregate market data available. In addition, the table presents the percentage distribution of the number of loans originated and purchased by the bank by loan size, regardless of the revenue size of the farm. Market share information is presented based on the most recent aggregate market data available.

- Table 12. Qualified Investments** - Presents the number and dollar amount of qualified investments made by the bank in each MSA/AA. The table separately presents investments made during prior evaluation periods that are still outstanding and investments made during the current evaluation period. Prior period investments are reflected at their book value as of the end of the evaluation period. Current period investments are reflected at their original investment amount even if that amount is greater than the current book value of the investment. The table also presents the number and dollar amount of unfunded qualified investment commitments. In order to be included, an unfunded commitment must have been reported on schedule RC-L of the Call Reports as an off-balance sheet item.
- Table 13. Distribution of Branch Delivery System and Branch Openings/Closings** - Compares the percentage distribution of the number of the bank's branches in low-, moderate-, middle- and upper-income geographies to the percentage of the population within each geography in each MSA/AA. The table also presents data on branch openings and closings in each MSA/AA.
- Table 14. Geographic and Borrower Distribution of Consumer Loans (OPTIONAL)** - For geographic distribution, the table compares the percentage distribution of the number of loans originated and purchased by the bank in low-, moderate-, middle- and upper-income geographies to the percentage distribution of the population within each geography. For borrower distribution, the table compares the percentage distribution of the number of loans originated and purchased by the bank to low-, moderate-, middle- and upper-income borrowers to the percentage of households by income level in each MSA/assessment area.

Table 1. Lending Volume

LENDING VOLUME		Evaluation Period: 01/01/1996 TO 12/31/2000										
MSA/Assessment Area	% of Rated Area Deposits in MSA/AA*	Home Mortgage		Small Loans to Businesses		Small Loans to Farms		Community Development		Total Reported Loans		% of Rated Area Loans (#) in AA
		#	\$ (000's)	#	\$ (000's)	#	\$ (000's)	#	\$ (000's)	#	\$ (000's)	
Full Scope												
Wheeling, W. Va.-Ohio MSA 9000	100.00	754	49,390	1,114	91,601	0	0	1	1,785	1,869	142,776	100.00

Table2. Geographic Distribution of Home Purchase Loans

Geographic Distribution: HOME PURCHASE																
Evaluation Period: 01/01/1996 TO 12/31/2000																
MSA/Assessment Area	Low Income Geographies		Moderate Income Geographies		Middle Income Geographies		Upper Income Geographies		Overall Market Rank*	Market Share by Geography*					Total Home Purchase Loans	
	% Owner Occ Units	% Bank Loans	% Owner Occ Units	% Bank Loans	% Owner Occ Units	% Bank Loans	% Owner Occ Units	% Bank Loans		Overall	Low	Mod	Mid	Upp	#	% of Total**
Full Scope																
Wheeling, W. Va.-Ohio MSA 9000	0.25	0.35	5.74	1.76	74.41	58.10	19.60	39.79	22	1.15	0.00	0.95	1.01	1.54	284	100.00

* Based on 1999 Aggregate HMDA Data Only only. Market rank is for all income categories combined.

** Home purchase loans originated and purchased in the MSA/AA as a percentage of all home purchase loans originated and purchased in the rated area.

Table 3. Geographic Distribution of Home Improvement Loans

Geographic Distribution: HOME IMPROVEMENT										Evaluation Period: 01/01/1996 TO 12/31/2000						
MSA/Assessment Area	Low Income Geographies		Moderate Income Geographies		Middle Income Geographies		Upper Income Geographies		Overall Market Rank*	Market Share by Geography*					Total Home Improvement Loans	
	% Owner Occ Units	% Bank Loans	% Owner Occ Units	% Bank Loans	% Owner Occ Units	% Bank Loans	% Owner Occ Units	% Bank Loans		Overall	Low	Mod	Mid	Upp	#	% of Total**
Full Scope																
Wheeling, W. Va.-Ohio MSA 9000	0.25	0.00	5.74	2.86	74.41	64.29	19.60	32.86	14	1.29	0.00	0.00	1.48	1.12	140	100.00

* Based on 1999 Aggregate HMDA Data Only only. Market rank is for all income categories combined.

** Home improvement loans originated and purchased in the MSA/AA as a percentage of all home improvement loans originated and purchased in the rated area.

Table 4. Geographic Distribution of Home Mortgage Refinance Loans

Geographic Distribution: HOME MORTGAGE REFINANCE										Evaluation Period: 01/01/1996 TO 12/31/2000							
MSA/Assessment Area	Low Income Geographies		Moderate Income Geographies		Middle Income Geographies		Upper Income Geographies		Overall Market Rank*	Market Share by Geography*					Total Home Mortgage Refinance Loans		
	% Owner Occ Units	% Bank Loans	% Owner Occ Units	% Bank Loans	% Owner Occ Units	% Bank Loans	% Owner Occ Units	% Bank Loans		Overall	Low	Mod	Mid	Upp	#	% of Total**	
Full Scope																	
Wheeling, W. Va.-Ohio MSA 9000	0.25	0.00	5.74	2.12	74.41	62.42	19.60	35.45	13	1.98	0.00	0.74	1.60	3.43	330	100.00	

* Based on 1999 Aggregate HMDA Data Only. Market rank is for all income categories combined.

** Home mortgage refinance loans originated and purchased in the MSA/AA as a percentage of all home mortgage refinance loans originated and purchased in the rated area.

Table 5. Geographic Distribution: Small Loans to Businesses

Geographic Distribution: SMALL BUSINESS																	Evaluation Period: 01/01/1996 TO 12/31/2000																
MSA/Assessment Area	Low Income Geographies		Moderate Income Geographies		Middle Income Geographies		Upper Income Geographies		Overall Market Rank*	Market Share by Geography*					Total Small Business Loans																		
	% of Businesses	% Bank Loans	% of Businesses	% Bank Loans	% of Businesses	% Bank Loans	% of Businesses	% Bank Loans		Overall	Low	Mod	Mid	Upp	#	% of Total**																	
Full Scope																																	
Wheeling, W. Va.-Ohio MSA 9000	1.88	1.71	24.07	12.93	53.38	50.90	20.66	34.47	4	9.34	0.00	5.43	10.15	11.76	1,114	100.00																	

* Based on 1999 Aggregate Small Business Data Only only. Market rank is for all income categories combined.

** Small loans to businesses originated and purchased in the MSA/AA as a percentage of all small loans to businesses originated and purchased in the rated area.

Table 6. Geographic Distribution: Small Loans to Farms

Geographic Distribution: SMALL FARM																
Evaluation Period: 01/01/1996 TO 12/31/2000																
MSA/Assessment Area	Low Income Geographies		Moderate Income Geographies		Middle Income Geographies		Upper Income Geographies		Overall Market Rank*	Market Share by Geography*					Total Small Farm Loans	
	% of Farms	% Bank Loans	% of Farms	% Bank Loans	% of Farms	% Bank Loans	% of Farms	% Bank Loans		Overall	Low	Mod	Mid	Upp	#	% of Total**
Full Scope																
Wheeling, W. Va.-Ohio MSA 9000	0.00	0.00	2.26	0.00	89.14	0.00	8.60	0.00	0	0.00	0.00	0.00	0.00	0.00	0	0.00

* Based on 1999 Aggregate Small Business Data Only only. Market rank is for all income categories combined.

** Small loans to farms originated and purchased in the MSA/AA as a percentage of all small loans to farms originated and purchased in the rated area.

Table 7. Borrower Distribution of Home Purchase Loans

Borrower Distribution: HMDA HOME PURCHASE										Evaluation Period: 01/01/1996 TO 12/31/2000						
MSA/Assessment Area	Low Income Borrowers		Moderate Income Borrowers		Middle Income Borrowers		Upper Income Borrowers		Overall Market Rank*	Market Share by Borrower Income*					Total Home Purchase Loans	
	% of Families	% Bank Loans**	% of Families	% Bank Loans**	% of Families	% Bank Loans**	% of Families	% Bank Loans**		Overall	Low	Mod	Mid	Upp	#	% of Total***
Full Scope																
Wheeling, W. Va.-Ohio MSA 9000	20.23	3.17	18.22	11.62	21.93	25.35	39.62	59.86	22	1.15	0.74	0.59	1.36	1.65	284	100.00

* Based on 1999 Aggregate HMDA Data Only only. Market rank is for all income categories combined.

** As a percentage of loans with borrower income information available.

*** Home purchase loans originated and purchased in the MSA/AA as a percentage of all home purchase loans originated and purchased in the rated area.

Table 8. Borrower Distribution of Home Improvement Loans

Borrower Distribution: HOME IMPROVEMENT										Evaluation Period: 01/01/1996 TO 12/31/2000						
MSA/Assessment Area	Low Income Borrowers		Moderate Income Borrowers		Middle Income Borrowers		Upper Income Borrowers		Overall Market Rank*	Market Share By Borrower Income*					Total Home Improvement Loans	
	% of Families	% Bank Loans**	% of Families	% Bank Loans**	% of Families	% Bank Loans**	% of Families	% Bank Loans**		Overall	Low	Mod	Mid	Upp	#	% of Total***
Full Scope																
Wheeling, W. Va.-Ohio MSA 9000	20.23	8.57	18.22	14.29	21.93	24.29	39.62	52.14	14	1.29	0.84	2.09	0.00	1.83	140	100.00

* Based on 1999 Aggregate HMDA Data only. Market rank is for all income categories combined.

** As a percentage of loans with borrower income information available. No information was available for 0% of loans originated by BANK.

*** Home improvement loans originated and purchased in the MSA/AA as a percentage of all home improvement loans originated and purchased in the rated area.

Table 9. Borrower Distribution of Home Mortgage Refinance Loans

Borrower Distribution: HOME MORTGAGE REFINANCE										Evaluation Period: 01/01/1996 TO 12/31/2000						
MSA/Assessment Area	Low Income Borrowers		Moderate Income Borrowers		Middle Income Borrowers		Upper Income Borrowers		Overall Market Rank*	Market Share by Borrower Income*					Total Home Mortgage Refinance Loans	
	% of Families	% Bank Loans**	% of Families	% Bank Loans**	% of Families	% Bank Loans**	% of Families	% Bank Loans**		Overall	Low	Mod	Mid	Upp	#	% of Total***
Full Scope																
Wheeling, W. Va.-Ohio MSA 9000	20.23	2.12	18.22	11.21	21.93	23.33	39.62	63.33	13	1.98	1.05	1.62	2.12	2.69	330	100.00

* Based on 1999 Aggregate HMDA Data only. Market rank is for all income categories combined.

** As a percentage of loans with borrower income information available. No information was available for 0% of loans originated by BANK.

*** Home mortgage refinance loans originated and purchased in the MSA/AA as a percentage of all home mortgage refinance loans originated and purchased in the rated area.

Table 10. Borrower Distribution: Small Loans to Businesses

Borrower Distribution: SMALL BUSINESS		Evaluation Period: 01/01/1996 TO 12/31/2000							
MSA/Assessment Area	Businesses With Revenues of \$1 million or less		% Distribution of Loans by Original Amount Regardless of Business Size			Market Share*			Total Small Loans to Businesses
	% Business**	% Bank Loans***	\$100,000 or less	> \$100,000 to \$250,000	> \$250,000 to \$500,000	All	Rev \$ 1 Million or Less	#	% of Total****
Full Scope									
Wheeling, W. Va.-Ohio MSA 9000	87.05	80.25	79.71	13.02	7.27	9.34	11.28	1,114	100.00

* The market consists of all other Small Business reporters in BANK's assessment area and is based on 1999 Aggregate Small Business Data Only only

** Businesses with revenues of \$1 million or less as a percentage of all businesses.

*** Small loans to businesses with revenues of \$1 million or less as a percentage of all loans reported as small loans to businesses. No information was available for XX% of small loans to businesses originated and purchased by the bank.

**** Small loans to businesses originated and purchased in the MSA/AA as a percentage of all small loans to businesses originated and purchased in the rated area.

Table 11. Borrower Distribution: Small Loans to Farms

Borrower Distribution: SMALL FARM		Evaluation Period: 01/01/1996 TO 12/31/2000							
MSA/Assessment Area	Businesses With Revenues of \$ 1million or less		% Distribution Loans by Original Amount Regardless of Farm Size			Market Share*		Total Small Farm Loans	
	% Farms**	% Bank Loans***	\$100,000 or less	> \$100,000 to \$250,000	> \$250,000 to \$500,000	All	Rev \$ 1 Million or Less	#	% of Total****
Full Scope									
Wheeling, W. Va.-Ohio MSA 9000	97.29	0.00	0.00	0.00	0.00	0.00	0.00	0	0.00

* The market consists of all other Small Farm reporters in BANK's assessment area and is based on 1999 Aggregate Small Business Data Only only

** Farms with revenues of \$ 1 million or less as a percentage of all farms.

*** As a percentage of loans with borrower income information available.

**** Small loans to farms originated and purchased in the MSA/AA as a percentage of all small loans to farms originated and purchased in the rated area.

Table 12. Qualified Investments

QUALIFIED INVESTMENTS									
Evaluation Period: 07/11/1996 TO 01/24/2001									
MSA/Assessment Area	Prior Period Investments*		Current Period Investments		Total Investments			Unfunded Commitments**	
	#	\$(000's)	#	\$(000's)	#	\$(000's)	% of Total	#	\$(000's)
Full Scope									
Wheeling, W. Va.-Ohio MSA 9000	0	0	0	0	0	0	0.00	0	0

* 'Prior Period Investments' means investments made in a previous evaluation period that remains outstanding.

** "Unfunded Commitments" means legally binding commitments reported on Report of Condition Schedule L-"Off-Balance Sheet Items".

Table13. Distribution of Branch Delivery System and Branch Openings/Closings

DISTRIBUTION OF BRANCH DELIVERY SYSTEM AND BRANCH OPENINGS/CLOSINGS																	Evaluation Period: 01/01/1996 TO 12/31/2000			
MSA/Assessment Area	Deposits	Branches						Branch Openings/Closings						Population						
	% of Rated Area Deposits in MSA/AA	# of Bank Branches	% of Rated Area Branches in MSA/AA	Location of Branches by Income of Geographies (%)				# of Branch Closings	# of Branch Openings	Net change in Location of Branches (+ or -)				% of the Population with Each Geography*						
				Low	Mod	Mid	Upp			Low	Mod	Mid	Upp	Low	Mod	Mid	Upp			
Full Scope																				
Wheeling, W. Va.-Ohio MSA 9000	100.00	9	100.00	0.00	0.00	55.56	44.44	1	3	0	0	0	2	0.61	8.12	72.69	18.58			

* The percentage of the population in the MSA/AA that resides in these geographies.

Table 1. Lending Volume

LENDING VOLUME												Evaluation Period: 01/01/1996 TO 12/31/2000											
MSA/Assessment Area	% of Rated Area Deposits in MSA/AA*	Home Mortgage		Small Loans to Businesses		Small Loans to Farms		Community Development		Total Reported Loans		% of Rated Area Loans (#) in AA											
		#	\$ (000's)	#	\$ (000's)	#	\$ (000's)	#	\$ (000's)	#	\$ (000's)												
Full Scope																							
Ohio Non-MSA	100.00	413	24,108	308	32,823	4	620	0	0	725	57,551	100.00											

Table2. Geographic Distribution of Home Purchase Loans

Geographic Distribution: HOME PURCHASE										Evaluation Period: 01/01/1996 TO 12/31/2000						
MSA/Assessment Area	Low Income Geographies		Moderate Income Geographies		Middle Income Geographies		Upper Income Geographies		Overall Market Rank*	Market Share by Geography*					Total Home Purchase Loans	
	% Owner Occ Units	% Bank Loans	% Owner Occ Units	% Bank Loans	% Owner Occ Units	% Bank Loans	% Owner Occ Units	% Bank Loans		Overall	Low	Mod	Mid	Upp	#	% of Total**
Full Scope																
Ohio Non-MSA	0.00	0.00	28.51	24.56	71.49	75.44	0.00	0.00	19	1.48	0.00	1.58	1.44	0.00	171	100.00

* Based on 1999 Aggregate HMDA Data only. Market rank is for all income categories combined.

** Home purchase loans originated and purchased in the MSA/AA as a percentage of all home purchase loans originated and purchased in the rated area.

Table 3. Geographic Distribution of Home Improvement Loans

Geographic Distribution: HOME IMPROVEMENT																
Evaluation Period: 01/01/1996 TO 12/31/2000																
MSA/Assessment Area	Low Income Geographies		Moderate Income Geographies		Middle Income Geographies		Upper Income Geographies		Overall Market Rank*	Market Share by Geography*					Total Home Improvement Loans	
	% Owner Occ Units	% Bank Loans	% Owner Occ Units	% Bank Loans	% Owner Occ Units	% Bank Loans	% Owner Occ Units	% Bank Loans		Overall	Low	Mod	Mid	Upp	#	% of Total**
Full Scope																
Ohio Non-MSA	0.00	0.00	28.51	43.24	71.49	56.76	0.00	0.00	12	0.94	0.00	2.31	0.00	0.00	37	100.00

* Based on 1999 Aggregate HMDA Data only. Market rank is for all income categories combined.

** Home improvement loans originated and purchased in the MSA/AA as a percentage of all home improvement loans originated and purchased in the rated area.

Table 4. Geographic Distribution of Home Mortgage Refinance Loans

Geographic Distribution: HOME MORTGAGE REFINANCE																	Evaluation Period: 01/01/1996 TO 12/31/2000	
MSA/Assessment Area	Low Income Geographies		Moderate Income Geographies		Middle Income Geographies		Upper Income Geographies		Overall Market Rank*	Market Share by Geography*					Total Home Mortgage Refinance Loans			
	% Owner Occ Units	% Bank Loans	% Owner Occ Units	% Bank Loans	% Owner Occ Units	% Bank Loans	% Owner Occ Units	% Bank Loans		Overall	Low	Mod	Mid	Upp	#	% of Total**		
Full Scope																		
Ohio Non-MSA	0.00	0.00	28.51	23.90	71.49	76.10	0.00	0.00	32	0.89	0.00	0.84	0.91	0.00	205	100.00		

* Based on 1999 Aggregate HMDA Data only. Market rank is for all income categories combined.

** Home mortgage refinance loans originated and purchased in the MSA/AA as a percentage of all home mortgage refinance loans originated and purchased in the rated area.

Table 5. Geographic Distribution: Small Loans to Businesses

Geographic Distribution: SMALL BUSINESS																
Evaluation Period: 01/01/1996 TO 12/31/2000																
MSA/Assessment Area	Low Income Geographies		Moderate Income Geographies		Middle Income Geographies		Upper Income Geographies		Overall Market Rank*	Market Share by Geography*					Total Small Business Loans	
	% of Businesses	% Bank Loans	% of Businesses	% Bank Loans	% of Businesses	% Bank Loans	% of Businesses	% Bank Loans		Overall	Low	Mod	Mid	Upp	#	% of Total**
Full Scope																
Ohio Non-MSA	0.00	0.00	32.21	27.92	67.79	72.08	0.00	0.00	10	1.68	0.00	3.64	1.17	0.00	308	100.00

* Based on 1999 Aggregate Small Business Data Only only. Market rank is for all income categories combined.

** Small loans to businesses originated and purchased in the MSA/AA as a percentage of all small loans to businesses originated and purchased in the rated area.

Table 6. Geographic Distribution: Small Loans to Farms

Geographic Distribution: SMALL FARM																
Evaluation Period: 01/01/1996 TO 12/31/2000																
MSA/Assessment Area	Low Income Geographies		Moderate Income Geographies		Middle Income Geographies		Upper Income Geographies		Overall Market Rank*	Market Share by Geography*					Total Small Farm Loans	
	% of Farms	% Bank Loans	% of Farms	% Bank Loans	% of Farms	% Bank Loans	% of Farms	% Bank Loans		Overall	Low	Mod	Mid	Upp	#	% of Total**
Full Scope																
Ohio Non-MSA	0.00	0.00	30.32	0.00	69.68	100.00	0.00	0.00	0	0.00	0.00	0.00	0.00	0.00	4	100.00

* Based on 1999 Aggregate Small Business Data Only only. Market rank is for all income categories combined.

** Small loans to farms originated and purchased in the MSA/AA as a percentage of all small loans to farms originated and purchased in the rated area.

Table 7. Borrower Distribution of Home Purchase Loans

Borrower Distribution: HMDA HOME PURCHASE										Evaluation Period: 01/01/1996 TO 12/31/2000						
MSA/Assessment Area	Low Income Borrowers		Moderate Income Borrowers		Middle Income Borrowers		Upper Income Borrowers		Overall Market Rank*	Market Share by Borrower Income*					Total Home Purchase Loans	
	% of Families	% Bank Loans**	% of Families	% Bank Loans**	% of Families	% Bank Loans**	% of Families	% Bank Loans**		Overall	Low	Mod	Mid	Upp	#	% of Total***
Full Scope																
Ohio Non-MSA	19.95	9.36	20.39	21.05	26.94	31.58	32.72	38.01	19	1.48	1.80	1.56	1.99	1.68	171	100.00

* Based on 1999 Aggregate HMDA Data only. Market rank is for all income categories combined.

** As a percentage of loans with borrower income information available.

*** Home purchase loans originated and purchased in the MSA/AA as a percentage of all home purchase loans originated and purchased in the rated area.

Table 8. Borrower Distribution of Home Improvement Loans

Borrower Distribution: HOME IMPROVEMENT																
Evaluation Period: 01/01/1996 TO 12/31/2000																
MSA/Assessment Area	Low Income Borrowers		Moderate Income Borrowers		Middle Income Borrowers		Upper Income Borrowers		Overall Market Rank*	Market Share By Borrower Income*					Total Home Improvement Loans	
	% of Families	% Bank Loans**	% of Families	% Bank Loans**	% of Families	% Bank Loans**	% of Families	% Bank Loans**		Overall	Low	Mod	Mid	Upp	#	% of Total***
Full Scope																
Ohio Non-MSA	19.95	18.92	20.39	16.22	26.94	43.24	32.72	21.62	12	0.94	2.63	0.00	2.00	0.00	37	100.00

* Based on 1999 Aggregate HMDA Data only. Market rank is for all income categories combined.

** As a percentage of loans with borrower income information available. No information was available for 0% of loans originated by BANK.

*** Home improvement loans originated and purchased in the MSA/AA as a percentage of all home improvement loans originated and purchased in the rated area.

Table 9. Borrower Distribution of Home Mortgage Refinance Loans

Borrower Distribution: HOME MORTGAGE REFINANCE										Evaluation Period: 01/01/1996 TO 12/31/2000						
MSA/Assessment Area	Low Income Borrowers		Moderate Income Borrowers		Middle Income Borrowers		Upper Income Borrowers		Overall Market Rank*	Market Share by Borrower Income*					Total Home Mortgage Refinance Loans	
	% of Families	% Bank Loans**	% of Families	% Bank Loans**	% of Families	% Bank Loans**	% of Families	% Bank Loans**		Overall	Low	Mod	Mid	Upp	#	% of Total***
Full Scope																
Ohio Non-MSA	19.95	2.93	20.39	15.61	26.94	33.66	32.72	47.80	32	0.89	0.00	1.33	0.74	1.76	205	100.00

* Based on 1999 Aggregate HMDA Data only. Market rank is for all income categories combined.

** As a percentage of loans with borrower income information available. No information was available for 0% of loans originated by BANK.

*** Home mortgage refinance loans originated and purchased in the MSA/AA as a percentage of all home mortgage refinance loans originated and purchased in the rated area.

Table10. Borrower Distribution: Small Loans to Businesses

Borrower Distribution: SMALL BUSINESS		Evaluation Period: 01/01/1996 TO 12/31/2000							
MSA/Assessment Area	Businesses With Revenues of \$1 million or less		% Distribution of Loans by Original Amount Regardless of Business Size			Market Share*			Total Small Loans to Businesses
	% Business**	% Bank Loans***	\$100,000 or less	> \$100,000 to \$250,000	> \$250,000 to \$500,000	All	Rev \$ 1 Million or Less	#	% of Total****
Full Scope									
Ohio Non-MSA	86.45	84.09	75.65	13.96	10.39	1.68	1.66	308	100.00

* The market consists of all other Small Business reporters in BANK's assessment area and is based on 1999 Aggregate Small Business Data Only only

** Businesses with revenues of \$1 million or less as a percentage of all businesses.

*** Small loans to businesses with revenues of \$1 million or less as a percentage of all loans reported as small loans to businesses. No information was available for XX% of small loans to businesses originated and purchased by the bank.

**** Small loans to businesses originated and purchased in the MSA/AA as a percentage of all small loans to businesses originated and purchased in the rated area.

Table 11. Borrower Distribution: Small Loans to Farms

Borrower Distribution: SMALL FARM		Evaluation Period: 01/01/1996 TO 12/31/2000							
MSA/Assessment Area	Businesses With Revenues of \$ 1million or less		% Distribution Loans by Original Amount Regardless of Farm Size			Market Share*		Total Small Farm Loans	
	% Farms**	% Bank Loans***	\$100,000 or less	> \$100,000 to \$250,000	> \$250,000 to \$500,000	All	Rev \$ 1 Million or Less	#	% of Total****
Full Scope									
Ohio Non-MSA	97.42	0.00	50.00	25.00	25.00	0.00	0.00	4	100.00

* The market consists of all other Small Farm reporters in BANK's assessment area and is based on 1999 Aggregate Small Business Data Only only

** Farms with revenues of \$1 million or less as a percentage of all farms.

*** As a percentage of loans with borrower income information available.

**** Small loans to farms originated and purchased in the MSA/AA as a percentage of all small loans to farms originated and purchased in the rated area.

Table 12. Qualified Investments

QUALIFIED INVESTMENTS									
Evaluation Period: 07/11/6 TO 01/24/2001									
MSA/Assessment Area	Prior Period Investments*		Current Period Investments		Total Investments			Unfunded Commitments**	
	#	\$(000's)	#	\$(000's)	#	\$(000's)	% of Total	#	\$(000's)
Full Scope									
Ohio Non-MSA	0	0	0	0	0	0	0.00	0	0

* 'Prior Period Investments' means investments made in a previous evaluation period that remains outstanding.

** "Unfunded Commitments" means legally binding commitments reported on Report of Condition Schedule L-"Off-Balance Sheet Items".

Table 13. Distribution of Branch Delivery System and Branch Openings/Closings

DISTRIBUTION OF BRANCH DELIVERY SYSTEM AND BRANCH OPENINGS/CLOSINGS																Evaluation Period: 01/01/1996 TO 12/31/2000			
MSA/Assessment Area	Deposits	Branches						Branch Openings/Closings						Population					
	% of Rated Area Deposits in MSA/AA	# of Bank Branches	% of Rated Area Branches in MSA/AA	Location of Branches by Income of Geographies (%)				# of Branch Closings	# of Branch Openings	Net change in Location of Branches (+ or -)				% of the Population with Each Geography*					
				Low	Mod	Mid	Upp			Low	Mod	Mid	Upp	Low	Mod	Mid	Upp		
Full Scope																			
Ohio Non-MSA	100.00	4	100.00	0.00	50.00	50.00	0.00	1	0	0	0	1	0	0.00	29.82	70.18	0.00		

* The percentage of the population in the MSA/AA that resides in these geographies.

