



PUBLIC DISCLOSURE

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COMMUNITY REINVESTMENT ACT PERFORMANCE EVALUATION

Peoples Bank, National Association
Charter Number 5552

138 Putnam Street
Marietta, OH 45750

Office of the Comptroller of the Currency

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Cleveland, OH 44114-2301

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

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Overall CRA Rating

Institution's CRA Rating: Satisfactory

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

Performance Levels	(Name of Depository Institution) Performance Tests		
	Lending Test*	Investment Test	Service Test
Outstanding			X
High Satisfactory	X		
Low Satisfactory		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:

- The bank originates a majority of loans inside its assessment areas (AA);
- The bank's lending activity is good;
- The bank's overall geographic distribution of loans is good, as evidenced by overall good home mortgage performance and good small loans to businesses performance;
- The bank's overall borrower income of loans is good, as evidenced by overall good distribution of home mortgage loans by income level of borrower and good distribution of loans to businesses with different revenue sizes;
- Community Development (CD) lending had a significantly positive impact on the Lending Test in Huntington-Ashland MMSA, Parkersburg-Marietta MMSA, and Columbus MSA. Loans supported affordable housing initiatives, activities that promote economic development, and activities that revitalized or stabilized LMI communities;
- Overall, bank branches are accessible to people and geographies of different income levels. Hours are generally adequate with no significant differences between branches located in different income levels. The bank offers an adequate level of services through alternative delivery systems. The record of opening and closing offices has not adversely impacted access to banking services. In the state of Ohio, West Virginia, Parkersburg MMSA, and Huntington-Ashland MMSA service delivery systems are accessible to essentially all portions of the AAs, equivalent with the size and scope of operations of the bank.
- PBNA provided a relatively high level of CD services.

Definitions and Common Abbreviations

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

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

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

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

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

Effective September 1, 2005, the Board of Governors of the Federal Reserve System, Office of the Comptroller of the Currency, and the Federal Deposit Insurance Corporation have adopted the following additional language as part of the revitalize or stabilize definition of community development.

Activities that revitalize or stabilize-

- (i) Low-or moderate-income geographies;
- (ii) Designated disaster areas; or
- (iii) Distressed or underserved nonmetropolitan middle-income geographies designated by the Board, Federal Deposit Insurance Corporation, and Office of the Comptroller of the Currency, based on-
 - a. Rates of poverty, unemployment, and population loss; or
 - b. Population size, density, and dispersion. Activities that revitalize and stabilize geographies designated based on population size, density, and dispersion if they help to meet essential community needs, including needs of low- and moderate-income individuals.

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

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

Family: Includes a householder and one or more other persons living in the same household who are related to the householder by birth, marriage, or adoption. The number of family households always equals the number of families; however, a family household may also include non-relatives living with the family. Families are classified by type as either a married-couple family or other family, which is further classified into 'male householder' (a family with a male householder' and no wife present) or 'female householder' (a family with a female householder and no husband present).

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

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

Home Mortgage Disclosure Act (HMDA): The statute that requires certain mortgage lenders that do business or have banking offices in a metropolitan statistical area to file annual summary reports of their mortgage lending activity. The reports include such data as the race, gender, and the income of applications, the amount of loan requested, and the disposition of the application (e.g., approved, denied, and withdrawn). Beginning in 2004, the reports also include data on loan pricing, the lien status of the collateral, any requests for preapproval and loans for manufactured housing.

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

Description of Institution

Peoples Bank, National Association (PBNA) is a full service interstate bank headquartered in Marietta, OH. PBNA is a wholly owned subsidiary of Peoples Bancorp, Inc. a \$2.4 billion diversified financial holding company also located in Marietta, OH. The bank conducts business in Ohio, West Virginia, and Kentucky. As of September 30, 2014, PBNA had total assets of \$2.4 billion, total loans of \$1.5 billion, and Tier One Capital of \$198.2 million.

PBNA primarily engages in generating deposits and originating loans. According to the FDIC Deposit Market Share Report dated June 30, 2014, PBNA had deposits of \$1.45 billion. PBNA has the largest deposit base in their headquarters county, Washington County, OH. They also have the second largest deposit base in the Parkersburg – Marietta Metropolitan Statistical Area (MSA). As of September 30, 2014, the bank had net of loans of \$1.49 billion, representing 61.35 percent of total assets. Approximately 71.28 percent of the bank's loan portfolio was comprised of real estate loans, of which commercial real estate and 1-4 family residential properties (36.12 percent and 32.54 percent, respectively) represented the predominant portion of the loan portfolio. Commercial and industrial loans made up 18.19 percent of the total loan portfolio and auto loans made up 10.23 percent of the total loan portfolio. Government loans and other consumer loans each accounted for less than two percent of the total loan portfolio.

In addition to their primary deposit and loan business, PBNA offers other banking products and services for consumers and businesses. Financial advisory services are offered through its trust and investments division. Insurance products are offered through Peoples Insurance Agency, LLC. Although the bank's business strategy is not limited to any one business line, its primary focus is retail banking in addition to providing banking services to small and middle market businesses, municipalities, and nonprofit organizations. The bank offers a standard product mix of loans, including FHA and SBA loans. In addition, PBNA maintains a trust department.

PBNA, the company's principal operating subsidiary, provides a comprehensive suite of financial services through its 59 offices in the states of Ohio, West Virginia, and Kentucky, as well as its mobile and internet banking channels, and network of 58 ATMs across its footprint. PBNA added one office in October 2013 that resulted their entering the Cleveland, OH MSA. In 2014, PBNA continued the growth strategy by added 12 offices and 8 ATMs via additional bank acquisitions. First National Bank Wellston (May 30, 2014), Ohio Heritage Bank Coshocton (August 22, 2014), and North Akron Savings Bank (October 24, 2014). The bank will be making its largest acquisition during the first quarter of 2015 with the addition of National Bank and Trust (NBT). NBT will expand the banks current footprint in Ohio with the addition of 22 new offices in and around the Cincinnati/Dayton market.

At the bank's request, we considered investments made by Peoples Capital Corporation, a subsidiary of the holding company. We also considered CRA-qualified grants provided by Peoples Bancorp Foundation, Inc. Established and incorporated in September 2003, this foundation serves as a non-profit for charitable purposes. The foundation's focus is on community investment and economic development, youth and education, human services programs that improve the social needs of low- and moderate-income communities and individuals, and arts and culture. These affiliates increase PBNA's capacity to reinvest in the community through qualified investments. We also considered CRA-qualified community development services provided by staff members of Peoples Financial Advisors. The activities of other affiliates do not materially affect the bank's capacity for community investment.

There are no known legal, financial, or other factors impeding the bank's ability to help meet the credit needs of its AAs. The bank received a Satisfactory rating in its previous CRA evaluation dated November 22, 2010.

Scope of the Evaluation

Evaluation Period/Products Evaluated

We analyzed home purchase, home improvement, and home refinance mortgage loans the bank reported under the Home Mortgage Disclosure Act (HMDA) and small loans made to businesses the bank reported under the Community Reinvestment Act. The evaluation period is November 23, 2010 through January 5, 2015. The start of the evaluation period corresponds to the date that the prior evaluation was performed. We analyzed home mortgage loan and small loans to business data for the calendar years 2010 through 2013. The review period for Community Development (CD) loans, qualified investments, and CD services is November 23, 2010 through January 5, 2015. Refer to appendix A for additional information.

Data Integrity

As part of our ongoing supervision of the bank, we tested the accuracy of the bank's HMDA and CRA lending data. We also reviewed the appropriateness of community development activities provided for consideration in our evaluation. This included testing of community development loans, investments, and services for accuracy and to determine if they qualify as community development as defined in the CRA regulation. We determined that the data reported publicly and the additional data provided for this evaluation are accurate.

Selection of Areas for Full-Scope Review

We selected at least one AA in each state where the bank has an office for a full-scope review. In addition, we reviewed the bank's performance within one Multistate Metropolitan Area where the bank operated branches in at least two states within the multistate metropolitan area using full-scope procedures. Full-scope reviews consider performance context, quantitative and qualitative factors. In general, the AAs selected for the full-scope review were chosen because they represented a significant portion of the bank's deposit base and lending business in that state and multistate area. The other AAs in each state were analyzed using limited-scope procedures. Limited-scope procedures consider quantitative factors only. Refer to the "Scope" section under each State and Multistate Metropolitan Area Rating section for details regarding how we selected the areas for review.

Ratings

The bank's overall rating is a blend of the multistate metropolitan area ratings and state ratings. The State of Ohio and Parkersburg-Marietta multistate metropolitan area received the most weight as they represent where the greatest degrees of PBNA's deposits, loans, and offices are located.

The multistate metropolitan area ratings and state ratings are based primarily on those areas that received full-scope reviews. Refer to the "Scope" section under each State and Multistate Metropolitan Area Rating section for details regarding how the areas were weighted in arriving at the respective ratings. When drawing conclusions for the lending test in each AA, loan products were weighted according to their relative percentage of volume within that AA. This approach provided consideration to the bank's varied presence within the individual AAs.

Inside/Outside Ratio

The ratio is a bank-wide calculation and not calculated by individual rating area or AA. Analysis is limited to bank origination and purchases and does not include any affiliate data. PBNA originated a majority of all loan products inside the bank's AAs (91.85 percent). The percentage in number of loans made inside the AAs by loan type are as follows: home refinance loans (92.89 percent), home purchase loans (90.30 percent), home improvement loans (89.76 percent), and small loans to businesses (81.78 percent).

Other

Our evaluation took into consideration information derived from members of the local communities. We contacted organizations that focus on providing or supporting community development activities, including affordable housing and social services to low- and moderate-income activities. This is further discussed within the Market Profile section in appendix B.

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.

Multistate Metropolitan Area Rating

Huntington- Ashland, WV-KY-OH Multistate Metropolitan Area

**CRA rating for the Huntington-Ashland, WV-KY-OH Multistate Metropolitan Area¹:
Satisfactory**

The Lending test is rated:	High Satisfactory
The Investment test is rated:	Low Satisfactory
The Service test is rated:	Outstanding

The major factors that support this rating include:

- An adequate level of lending for home mortgage loans and small loans to businesses;
- An adequate geographic distribution of home mortgage loans and small loans to businesses;
- An adequate distribution, based on borrower income level, of home mortgage and small loans to businesses;
- A significantly positive level of CD loans that were responsive to community needs;
- An adequate level of CD investments and donations;
- A branch distribution that is readily accessible to LMI geographies and individuals; and
- A good level of CD services that were responsive to community needs.

Description of Institution’s Operations in Huntington-Ashland WV-KY-OH Multistate Metropolitan Area

The Huntington-Ashland Multistate MSA consists of three counties in two states: West Virginia and Kentucky. PBNA’s delineated AA consists of Cabell County in West Virginia and Boyd and Greenup County in Kentucky. The full MMSA is not included since the bank does not have offices in Lawrence County, Ohio or Wayne County, West Virginia. As of June 30, 2013, bank deposits in the Huntington-Ashland MMSA totaled \$116 million. This represents 8.1 percent of PBNA’s total deposits. Ranked by deposits, the Huntington-Ashland MMSA rating area is the third largest rating area for the bank. In terms of deposit market share, PBNA ranks thirteenth with a 3.32 percent of the market share. Within this assessment area, the bank operates six branches and five deposit-taking ATMs.

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.

These branches represent 14.2 percent of the bank's total branch network. Of the six branches located within the metropolitan area, four are located in West Virginia and two are located in Kentucky. As such, performance in this rating area has a material impact on the bank's overall CRA rating.

Refer to the market profile for the Huntington-Ashland MMSA in appendix C for detailed demographics and other performance context information for assessment areas that received full-scope reviews.

Scope of Evaluation in Huntington-Ashland MMSA

PBNA has one AA in the Huntington-Ashland MMSA. As a result, we performed a full-scope review on the entire Huntington-Ashland MMSA.

LENDING TEST

Conclusions for Areas Receiving Full-Scope Reviews

The bank's performance under the lending test in the Huntington-Ashland MMSA is "High Satisfactory." Based on the full scope review, the bank's performance in the AA is good.

Lending Activity

Refer to Tables 1 Lending Volume and 1 Other in the Huntington-Ashland MMSA section of appendix D for the facts and data used to evaluate the bank's lending activity.

Lending activity in the Huntington-Ashland MMSA is good, considering the strong competition for all types of loans in the bank's AA. In the AA, PBNA had a deposit market share of 3.32 percent as of June 30, 2013, and ranked thirteenth among 21 depository institutions. Competition for home purchase lending was strong, with 121 lenders in the AA. PBNA ranked twenty-second in home purchase lending with a 1.46 percent market share. For home improvement lending, the bank ranked fifth with a 5.20 percent market share. Home refinance lending is also competitive with 130 lenders in the AA. Peoples ranked seventeenth in home refinance lending with a 2.07 percent market share. Due to an insufficient number of loans, multifamily lending was not evaluated.

Small business lending is highly competitive in the AA. Peoples ranked sixteenth out of 38 total lenders for small business lending, with a market share of 2.04 percent. The top five lenders control a majority of the market with a combined market share of 46.45 percent.

Distribution of Loans by Income Level of the Geography

Overall, PBNA geographic distribution of loans in the Huntington-Ashland MMSA AA is adequate. In performing our analysis, we placed greater weight on the bank's home mortgage lending as home mortgage loans represented the majority of the bank's CRA reportable lending activity. Within home mortgage lending, more weight was given to refinance loans based on amount of originations during the evaluation period. Additionally, equal weight was given to 2010 through 2013 performance years.

Home Mortgage Loans

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

The overall geographic distribution of home purchase loans is poor. In 2012 and 2013, the geographic distribution of home purchase loans was poor. The percentage of loans in low-income geographies was well below the percentage of owner-occupied units in these geographies. The percentage of loans in moderate-income geographies was near the percentage of owner-occupied units in these geographies.

PBNA market share during the period was very poor. The bank's market share in both LMI geographies was significantly below the overall market share. During the 2010 and 2011 performance years, the bank did not originate or purchase a sufficient number of loans for a meaningful analysis.

The overall geographic distribution of home improvement loans is very poor. The bank's geographic distribution of home improvement loans in 2012 and 2013 was very poor. The percentage of loans in both the LMI geographies was significantly below the percentage of owner-occupied units in these geographies. The bank's market share during this period was poor. The bank's market share in low-income geographies was significantly below the overall market share. The bank's market share in moderate-income geographies was below the overall market share. The bank's performance in 2010 through 2011 was not inconsistent with the performance noted in 2012 through 2013.

The overall geographic distribution of home refinance loans is adequate. The bank's geographic distribution of home refinance loans during 2012 through 2013 was adequate. The percentage of loans in low-income geographies was well below the percentage of owner-occupied units in these geographies. The portion of loans in moderate-income geographies was well below the percentage of owner-occupied units in these geographies. The bank's market share during this period was good. The bank's market share in the low-income geographies exceeded the overall market share in these geographies. The bank's market share in the moderate-income geographies was below the overall market share in these geographies. The bank's geographic distribution of home refinance loans during 2010 through 2011 was stronger and considered good due to stronger performance, particularly in low-income geographies.

The bank did not originate or purchase a sufficient number of multifamily loans for a meaningful analysis.

Small Loans to Businesses

Refer to Table 6 in the Huntington-Ashland MMSA section of appendix D for the facts and data used to evaluate the geographic distribution of the bank's origination/purchase of small loans to businesses.

The overall geographic distribution of small loans to businesses is adequate. The bank's geographic distribution of small loans to businesses in 2012 through 2013 was adequate. The portion of loans in low-income geographies was significantly below the percentage of businesses in those geographies. The portion of loans in moderate-income geographies exceeded the percentage of small businesses in these geographies. The bank's market share was poor. The bank's market share in the low-income geographies was significantly below the overall market share. The bank's market share in the moderate-income geographies was below the overall market share. The bank's geographic distribution of small loans to businesses during 2010 through 2011 was stronger and considered good due to stronger performance, particularly in moderate-income geographies.

Lending Gap Analysis

We reviewed summary reports and maps and analyzed PBNA home mortgage and small business lending activity over the evaluation period to identify any gaps in the geographic distribution of loans. We did not identify any unexplained conspicuous gaps.

Distribution of Loans by Income Level of the Borrower

Home Mortgage Loans

Overall, PBNA's borrower distribution of loans in the Huntington-Ashland MMSA AA is adequate. In performing our analysis, we placed greater weight on the bank's home mortgage lending as home mortgage loans represented the majority of the bank's CRA reportable lending activity. Within home mortgage lending, more weight was given to refinance loans based on amount of originations during the evaluation period. Additionally, equal weight was given to 2010 through 2013 performance years

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

The overall borrower distribution of home purchase loans is good. The bank's borrower distribution of home purchase loans during 2012 through 2013 was good. The percentage of home purchase loans to low-income borrowers was well below the percentage of such families. The portion of loans to moderate-income borrowers exceeded the percentage of moderate-income families. The bank's market share during the period was good. The bank's market share to low-income borrowers exceeded the overall market share. The bank's market share to moderate-income borrowers was near the overall market share. The bank's borrower distribution of home purchase loans for performance years 2010 through 2011 were not evaluated. The bank did not originate or purchase a sufficient number home purchase loans for a meaningful analysis.

The overall borrower distribution of home improvement loans is adequate. The bank's borrower distribution of home improvement loans during 2012 through 2013 was adequate. The percentage of home improvement loans to low-income borrowers was near the percentage of such families. The portion of loans to moderate-income borrowers was significantly below the percentage of moderate-income families. The bank's market share during the period was adequate. The bank's market share to low-income borrowers exceeded the overall market share. The bank's market share to moderate-income borrowers was well below the overall market share. The bank's borrower distribution of home improvement loans during 2010 through 2011 was stronger and considered good due to stronger performance, particularly in moderate-income geographies.

The overall borrower distribution of home refinance loans is adequate. The bank's borrower distribution of home refinance loans during 2012 through 2013 was good. The percentage of home refinance loans to low-income borrowers was below the percentage of such families. The portion of loans to moderate-income borrowers exceeded the percentage of moderate-income families. The bank's market share during the period was excellent. The bank's market share to LMI borrowers exceeded the overall market share. The bank's borrower distribution of home refinance loans during 2010 through 2011 was weaker and considered adequate due to weaker performance, particularly to low-income borrowers.

Small Loans to Businesses

Refer to Table 11 in the Huntington-Ashland MMSA section of appendix D for the facts and data used to evaluate the borrower distribution of the bank's origination/purchase of small loans to businesses.

The overall borrower distribution of small loans to businesses is good. The bank's borrower distribution of small loans to businesses in 2012 through 2013 was good. The percentage of small loans to small businesses (businesses with gross annual revenue of \$1 million or less) was below the percentage of small businesses. This performance was enhanced by an excellent market share. The bank's performance in 2010 through 2011 was not inconsistent with the performance noted during 2012 through 2013.

Community Development Lending

Refer to Table 1 Lending Volume in the Huntington-Ashland MMSA section of appendix D for the facts and data used to evaluate the bank's level of community development lending. This table includes all community development loans, including multifamily loans that also qualify as community development loans. In addition, Table 5 includes geographic lending data on all multi-family loans, including those that also qualify as community development loans. Table 5 does not separately list community development loans, however.

PBNA level of Community Development lending had a significantly positive impact on its overall lending performance in the Huntington-Ashland MMSA. PBNA reported 17 loans totaling \$27.4 million to organizations and companies that provide community services targeted to LMI individuals, promotion of economic development, and activities that revitalize/stabilize LMI geographies. The total outstanding dollar amount represents 171.34 percent of allocated capital.

The bank's CD lending activity is summarized below:

- PBNA funded a \$12.6 million loan to acquire land and construct a nearly 46,000 square foot medical facility in Ironton, Ohio. The loan was originated to the Ironton/Lawrence City Area Community Action Organization, whose function is to identify and analyze poverty related issues in their community. The organization then stimulates and mobilizes public and private efforts to improve these LMI situations. The services include Medical Centers, Family Guidance Centers, Drug/Alcohol Training and Treatment, and Senior Service Programs.
- PBNA funded a loan for \$8.1 million to Metropolitan Huntington, LLC. The proceeds were used to purchase property from the Huntington Urban Development Authority. The property was revitalized into a shopping center to stimulate economic development in downtown Huntington.
- A \$1 million loan was funded to the Boyd County Board of Education. The proceeds were used to cover operating expenses for the school district. The majority of schools in the district serve 57 percent of the LMI student population.
- A \$945 thousand construction loan to the Lawrence Economic Development Corporation (LEDC). LEDC is a non-profit Community Improvement Corp (CIC) formed in 1983 and designated the economic development agent for the City of Ironton and Lawrence County. Their purpose is job creation and retention, as well as, to provide assistance in community enhancement projects. Loan proceeds were used to construct a new industrial building at the Point Industrial Park.
- A \$500 thousand construction loan to The Point Villas Phase IV Limited Partnership. The partnership built 14 single-family rental units, 6 (1 1/2 story 1,460 sq. ft. living space) and eight (one story 1,190 sq. ft. living space). All units are affordable housing units for LMI. In addition,

there is an Ohio Neighborhood Stabilization Program (NSP) Grant funded by Ohio Department of Development's (ODOD's) Community Development Division and its Office of Housing and Community Partnerships (OHCP), which are funded by HUD. Ohio Housing Finance Agency (OHFA) & Housing Development Gap Financing (HDGF) are also used. Ohio Linked Deposit Program was also utilized with the project.

Product Innovation and Flexibility

PBNA offers a standard product mix of loans including USDA guaranteed, SBA, FHA, and Rural Housing loans throughout all of its assessment areas. The bank's loan product flexibility had a neutral impact on its Lending conclusions. PBNA offers the following flexible loan programs targeted to low- and moderate income borrowers. Loans originated under these programs are included in the bank's home mortgage loans and loans to small businesses and are analyzed under other portions of the Lending Test.

- PBNA offers, through the U.S. Department of Agriculture's Rural Housing Section 502 guaranteed loan program. This is a flexible financing option that features no down payment requirements, where loan proceeds can be used to construct, purchase, and rehabilitate single family homes. The majority of the loans made by PBNA under this program were to low- or moderate-income areas. During the evaluation period, the bank made \$451 thousand in loans to borrowers within the AA.
- PBNA also made two Small Business Administration loans totaling \$200 thousand to a local childcare business.

INVESTMENT TEST

Conclusions for Areas Receiving Full-Scope Reviews

The bank's performance under the investment test in Huntington-Ashland MMSA is rated ("Low Satisfactory"). Based on a full-scope review, the bank's performance in the Huntington-Ashland MMSA is adequate.

Refer to Table 14 in the Huntington-Ashland MMSA section of appendix D for the facts and data used to evaluate the bank's level of qualified investments.

During the evaluation period, PBNA made three investments in the Huntington-Ashland MMSA totaling \$298 thousand and contributed numerous donations totaling \$112 thousand. There were no prior period investments. The total investments of \$410 thousand in the AA represent 2.56 percent of allocated Tier One Capital. PBNA has a poor level of responsiveness to affordable housing and economic development needs in the AA.

In terms of total dollar volume, 53.47 percent of the bank's investments and donations in the AA included GNMA Mortgage Backed Securities backed by housing loans to low and moderate-income individuals in the AA. PBNA purchased the MBS pool for \$155 thousand. The remaining two investments were to West Virginia State Housing Development Bonds totaling \$139 thousand or 46.6 percent of the total investments within the Huntington-Ashland AA. These bonds were developed to

increase the supply of residential housing for persons and families of low- and moderate-income and to provide construction and permanent mortgage financing to public and private sponsors of such housing.

SERVICE TEST

The bank's performance under the Service Test for Huntington-Ashland MMSA is rated "Outstanding." Based on a full scope review, the bank's performance in Huntington-Ashland MMSA is excellent.

Retail Banking Services

Refer to Table 15 in the Huntington-Ashland MMSA section of appendix D for the facts and data used to evaluate the distribution of the bank's branch delivery system and branch openings and closings.

The distribution of bank branches is excellent in the Huntington-Ashland MMSA, as they are readily accessible to all portions of the full scope area. The percentage of bank branches in low-income geographies exceeds the percentage of the population residing in those geographies. The portion of bank branches in moderate-income geographies also exceeds the percentage of the population residing in those geographies. During the evaluation period, PBNA did not open or close any bank branches within the AA.

PBNA offered a full range of loan and deposit products and the services offered at each branch are generally consistent and do not vary in a way that would inconvenience portions of the AA. Branch hours are standard and include weekdays and Saturday hours.

Community Development Services

PBNA exhibited good performance in addressing the CD needs of the Huntington-Ashland MMSA. In total, the bank served 20 various organizations. Type of organizations included three affordable housing, 10 community service and five economic development/small business activity. The bank has a good level of CD services that are responsive of the needs within the AA. Peoples Bank has supported employee volunteerism to aid the economic and social health of the communities it serves. Four employees, served in leadership roles as board or committee to eight qualified organizations. In total, employees devoted 379 hours of service in the AA. The focus of one CDC organization, is the provide loans to small businesses and training for startup businesses. In addition, the organization provides financial expertise and financial support for LMI business development, training and SBA loan information. PBNA employees held leadership roles providing financial literacy for LMI high school students, providing guidance to stimulate small business growth, and wellness programs for LMI individuals. A PBNA employee is also a board member of the organization.

PBNA offers free check cashing for Mountaineer cardholders, a food stamp debit card program that allows cash advances at no charge or fees charged with ATM debit transactions. The bank also offers various other free of charge check cashing services for both customers and no-customers.

Multistate Metropolitan Area Rating

Parkersburg-Marietta, Multistate Metropolitan Area

CRA rating for the Parkersburg-Marietta, Multistate Metropolitan Area²: Outstanding

The Lending test is rated:	Outstanding
The Investment test is rated:	Low Satisfactory
The Service test is rated:	Outstanding

The major factors that support this rating include:

- An excellent level of lending activity for home mortgage loans and small loans to businesses;
- An adequate geographic distribution of home mortgage loans and small loans to businesses;
- A good distribution, based on borrower income level, of home mortgage and small loans to businesses;
- A significantly positive level of CD loans that were responsive to community needs;
- An adequate level of CD investments and donations;
- A branch distribution that is readily accessible to LMI geographies and individuals; and
- An excellent level of CD services that were responsive to community needs.

Description of Institution's Operations in Parkersburg-Marietta Multistate Metropolitan Area

PBNA has six offices within the Parkersburg-Marietta multistate MSA, offering a full range of residential, consumer, and commercial financial products and services. Offices are located in Wood and Washington Counties in Ohio. As of June 30, 2013, bank deposits in the MMSA totaled \$552.5 million. This represents 40.58 percent of PBNA's total deposits. Ranked by deposits, the Parkersburg-Marietta MMSA rating area is the largest rating area for the bank. In terms of deposit market share, PBNA ranks second with a 19.46 percent of the market share. Within this assessment area, the bank operates six branches and fourteen deposit-taking ATMs.

Refer to the market profile for the Parkersburg-Marietta MMSA in appendix C for detailed demographics and other performance context information for assessment areas that received full-scope reviews.

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

Scope of Evaluation in Parkersburg-Marietta MMSA

PBNA has one AA in the Parkersburg-Marietta MMSA. As a result, we performed a full-scope review on the entire Parkersburg-Marietta MMSA.

LENDING TEST

Conclusions for Areas Receiving Full-Scope Reviews

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

Lending Activity

Refer to Tables 1 Lending Volume and 1 Other in the Parkersburg-Marietta MMSA section of appendix D for the facts and data used to evaluate the bank's lending activity.

Lending activity in the Parkersburg-Marietta MMSA is excellent, considering the strong competition for all types of loans in the bank's AA. In the AA, PBNA had a deposit market share of 8.10 percent as of June 30, 2013, and ranked seventh among 31 depository institutions. Competition for home purchase lending was strong, with 91 lenders in the AA. PBNA ranked first in home purchase lending with an 11.48 percent market share. For home improvement lending, the bank ranked first with a 18.62 percent market share. Home refinance lending is also competitive with 129 lenders in the AA. PBNA ranked first in home refinance lending with a 16.62 percent market share. Due to an insufficient number of loans, multifamily lending was not evaluated.

Small business lending is highly competitive in the AA. PBNA ranked fifth out of 36 total lenders for small business lending, with a market share of 7.44 percent. The top five lenders control a majority of the market with a combined market share of 52.47 percent.

Distribution of Loans by Income Level of the Geography

Overall, PBNA geographic distribution of loans in the Parkersburg-Marietta MMSA AA is adequate. In performing our analysis, we placed greater weight on the bank's home mortgage lending as home mortgage loans represented the majority of the bank's CRA reportable lending activity. Within home mortgage lending, more weight was given to refinance loans based on amount of originations during the evaluation period. Additionally, equal weight was given to 2010 through 2013 performance years.

Home Mortgage Loans

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

The overall geographic distribution of home purchase loans is adequate. In 2012 and 2013, the geographic distribution of home purchase loans was good. In the low-income geographies, the percentage of owner-occupied units was less than 1 percent; therefore, an analysis was not meaningful. The percentage of loans in moderate-income geographies exceeded the percentage of owner-occupied

units in these geographies. PBNA market share during the period was poor. The bank's market share in the low-income geographies was significantly below the overall market share. The bank's market share in the moderate-income geographies was near the overall market share. The bank's geographic distribution of home purchase loans during 2010 through 2011 was weaker and considered adequate due to weaker performance, particularly in moderate-income geographies.

The overall geographic distribution of home improvement loans is adequate. The bank's geographic distribution of home improvement loans in 2012 and 2013 was poor. In the low-income geographies, the percentage of owner-occupied units was less than 1 percent; therefore, an analysis was not meaningful. The percentage of loans in moderate-income geographies was below the percentage of owner-occupied units in these geographies. The bank's market share during this period was poor. The bank's market share in both LMI geographies was significantly below the overall market share. The bank's performance was enhanced by its performance during 2010 through 2011. The bank's geographic distribution of home improvement loans during 2010 through 2011 was stronger and considered good due to stronger performance, particularly in moderate-income geographies.

The overall geographic distribution of home refinance loans is poor. The bank's geographic distribution of home refinance loans during 2012 through 2013 was adequate. In the low-income geographies, the percentage of owner-occupied units was less than 1 percent; therefore, an analysis was not meaningful. The percentage of loans in moderate-income geographies was below the percentage of owner-occupied units in these geographies. The bank's market share during this period was poor. The bank's market share in the low-income geographies was significantly below the overall market share in these geographies. The bank's market share in the moderate-income geographies was near the overall market share in these geographies. The bank's geographic distribution of home refinance loans during 2010 through 2011 was weaker and considered very poor due to weaker performance, particularly in moderate-income geographies.

The bank did not originate or purchase a sufficient number of multifamily loans for a meaningful analysis.

Small Loans to Businesses

Refer to Table 6 in the Parkersburg-Marietta MMSA section of appendix D for the facts and data used to evaluate the geographic distribution of the bank's origination/purchase of small loans to businesses.

The overall geographic distribution of small loans to businesses is good. The bank's geographic distribution of small loans to businesses in 2012 through 2013 was good. In the low-income geographies, the percentage of small businesses was less than 1 percent; therefore, an analysis was not meaningful. The portion of loans in moderate-income geographies exceeded the percentage of small businesses in these geographies. The bank's market share was adequate. The bank's market share in the low-income geographies was significantly below the overall market share. The bank's market share in the moderate-income geographies exceeded the overall market share. The bank's geographic distribution of small loans to businesses during 2010 through 2011 was not inconsistent with the performance noted during 2012 through 2013.

Lending Gap Analysis

We reviewed summary reports and maps and analyzed PBNA home mortgage and small business lending activity over the evaluation period to identify any gaps in the geographic distribution of loans. We did not identify any unexplained conspicuous gaps.

Distribution of Loans by Income Level of the Borrower

Home Mortgage Loans

Overall, PBNA borrower distribution of loans in the Parkersburg-Marietta MMSA AA is good. In performing our analysis, we placed greater weight on the bank's home mortgage lending as home mortgage loans represented the majority of the bank's CRA reportable lending activity. Within home mortgage lending, more weight was given to refinance loans based on amount of originations during the evaluation period. Additionally, equal weight was given to 2010 through 2013 performance years.

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

The overall borrower distribution of home purchase loans is good. The bank's borrower distribution of home purchase loans during 2012 through 2013 was good. The percentage of home purchase loans to low-income borrowers was below the percentage of such families. The portion of loans to moderate-income borrowers exceeded the percentage of moderate-income families. The bank's market share during the period was good. The bank's market share to low-income borrowers exceeded the overall market share. The bank's market share to moderate-income borrowers was near the overall market share. The bank's borrower distribution of home purchase loans during 2010 through 2011 was not inconsistent with the performance noted during 2012 through 2013.

The overall borrower distribution of home improvement loans is adequate. The bank's borrower distribution of home improvement loans during 2012 through 2013 was adequate. The percentage of home improvement loans to low-income borrowers was well below the percentage of such families. The portion of loans to moderate-income borrowers exceeded the percentage of moderate-income families. The bank's market share during the period was adequate. The bank's market share to low-income borrowers was significantly below the overall market share. The bank's market share to moderate-income borrowers exceeded the overall market share. The bank's borrower distribution of home improvement loans during 2010 through 2011 was not inconsistent with the performance noted during 2012 through 2013.

The overall borrower distribution of home refinance loans is good. The bank's borrower distribution of home refinance loans during 2012 through 2013 was good. The percentage of home refinance loans to low-income borrowers was well below the percentage of such families. The portion of loans to moderate-income borrowers exceeded the percentage of moderate-income families. The bank's market share during the period was good. The bank's market share to low-income borrowers was near the overall market share. The bank's market share to moderate-income borrowers exceeded the overall market share. The bank's borrower distribution of home refinance loans during 2010 through 2011 was not inconsistent with the performance noted during 2012 through 2013.

Small Loans to Businesses

Refer to Table 11 in the Parkersburg-Marietta MMSA section of appendix D for the facts and data used to evaluate the borrower distribution of the bank's origination/purchase of small loans to businesses.

The overall borrower distribution of small loans to businesses is excellent. The bank's borrower distribution of small loans to businesses in 2012 through 2013 was excellent. The percentage of small loans to small businesses (businesses with gross annual revenue of \$1 million or less) exceeded the percentage of small businesses. This performance was enhanced by an excellent market share. The bank's performance in 2010 through 2011 was not inconsistent with the performance noted during 2012 through 2013.

Community Development Lending

Refer to Table 1 Lending Volume in the Parkersburg-Marietta MMSA section of appendix D for the facts and data used to evaluate the bank's level of community development lending. This table includes all community development loans, including multifamily loans that also qualify as community development loans. In addition, Table 5 includes geographic lending data on all multi-family loans, including those that also qualify as community development loans. Table 5 does not separately list community development loans, however.

PBNA's level of Community Development lending had a significantly positive impact on its overall lending performance in the Parkersburg-Marietta MSA. PBNA reported three loans totaling \$9.31 million to organizations and companies that provide community services targeted to LMI individuals, promotion of economic development, and activities that revitalize/stabilize LMI geographies. The total outstanding dollar amount represents 84.40 percent of allocated capital. The bank's CD lending activity is summarized below:

PBNA funded an \$8.3 million CRE loan originated with Highland-Clarksburg Hospital, Inc. The loan purpose was for significant renovations to the actual Hospital buildings. The hospital offers treatment of mental health/substance abuse, mental health intellectually disabled and acute care. They provide care regardless of ability to pay. Discounts are based on household income and size using a sliding scale.

PBNA also funded an \$863 thousand construction bridge loan to the Southeastern Ohio Port Authority. The loan proceeds are to be used to construct a 35,000 square foot structure on five acres located at Seven North Commerce Park in Marietta Township (Reno). The pre-engineered steel building (known as Ingenuity Center) will consist of 30,000 square feet of high bay manufacturing, research and development space, and approximately 4,700 square feet of office space. Port Authority is actively recruiting potential tenants and has an interested party from Indiana. As an economic development organization, the Port Authority's mission is to enhance the economic competitiveness of Washington County and to be a catalyst for job creation and investment by business, industry and local entrepreneurs.

Product Innovation and Flexibility

PBNA offers a standard product mix of loans including USDA guaranteed, SBA, FHA, and Rural Housing loans throughout all of its assessment areas. The bank's loan product flexibility had a positive impact on its Lending conclusions. PBNA offers the following flexible loan programs targeted to low- and moderate income borrowers. Loans originated under these programs are included in the bank's home mortgage loans and loans to small businesses and are analyzed under other portions of the Lending Test.

- PBNA offers, through the U.S. Department of Agriculture's Rural Housing Section 502 guaranteed loan program. This is a flexible financing option that features no down payment requirements, where loan proceeds can be used to construct, purchase, and rehabilitate single family homes. The majority of the loans made by PBNA under this program were to low- or moderate-income areas. During the evaluation period, the bank made \$8.7 million in loans to borrowers within the AA.
- Loans were made through Ohio Housing Authority's First Time Homebuyer program. This program feature flexible financing that include below market interest rates and low fee loans. The majority of the loans made by PBNA under this program were to low- or moderate-income borrowers or to borrowers located in low- or moderate-income areas. During the evaluation period, the bank made \$278 thousand within the AA.
- Additionally the bank also made \$172 thousand in Federal Housing Association loans to low- and moderate-income borrowers.

INVESTMENT TEST

Conclusions for Areas Receiving Full-Scope Reviews

The bank's performance under the investment test in Parkersburg-Marietta MMSA is rated "Low Satisfactory". Based on a full-scope review, the bank's performance in the Parkersburg-Marietta MMSA is an adequate.

Refer to Table 14 in the Parkersburg-Marietta MMSA section of appendix D for the facts and data used to evaluate the bank's level of qualified investments.

During the evaluation period, PBNA made five investments in the Parkersburg-Marietta MMSA totaling \$1.74 million and contributed numerous donations totaling \$249 thousand. In addition, one prior period investment remained outstanding at the end of the evaluation period, with a book value of \$470 thousand. The total investments of \$2.46 million in the AA represent 3.06 percent of allocated Tier One Capital, reflecting an adequate performance.

The largest investment was made in the Ohio Housing Finance Agency Bond, which issues tax-exempt bonds and proceeds from the sale of the bonds are used to fund construction loans and mortgage loans at below-market interest rates. Sale and use of the proceeds from the bonds is used for Rural Housing loans and other home programs to increase affordable housing opportunities for individuals in the state

of Ohio. PBNA had excellent responsiveness to affordable housing and economic development needs in the AA. The following are examples of these investments:

A \$643 thousand investment for two new bonds purchased was made for the West Virginia State Housing Development. This bond was established to increase the supply of residential housing for persons and families of low- and moderate-income and to provide construction and permanent mortgage financing to public and private sponsors of such housing.

PBNA purchased GNMA Mortgage Backed Securities totaling \$64 thousand, which included a pool of various AAs. These securities are backed by housing loans to low and moderate-income individuals in the AA

Additionally a \$1 million Ohio Finance Fund was included as a prior period investment involving a New Market Tax Credit Program to support low-income housing projects in Nobel County.

SERVICE TEST

The bank's performance under the Service Test in Parkersburg-Marietta MMSA is rated 'Outstanding.' Based on full scope review, the bank's performance in the Parkersburg-Marietta MMSA is excellent.

Retail Banking Services

Refer to Table 15 in the Parkersburg-Marietta MMSA section of appendix D for the facts and data used to evaluate the distribution of the bank's branch delivery system and branch openings and closings.

The distribution of bank branches is excellent in the Parkersburg-Marietta MMSA, as they are readily accessible to all portions of the full scope area. There are no low-income geographies in the Parkersburg-Marietta MSA. The percentage of bank branches in moderate-income geographies exceeds the percentage of the population residing in those geographies. During the evaluation period, PBNA did not open or close any bank branches within the LMI geographies.

PBNA offered a full range of loan and deposit products and the services offered at each branch are generally consistent and do not vary in a way that would inconvenience portions of the AA. Branch hours are standard and include weekdays and Saturday hours.

Community Development Services

PBNA Bank exhibited excellent performance in addressing the CD needs of the Parkersburg-Marietta MMSA. In the Parkersburg-Marietta MMSA, 66 PBNA employees provided their expertise to 57 different CD organizations. The bank supported one affordable housing organization, 50 community service groups, two revitalization groups for LMI areas and 2 economic development/small business groups, for a total of 1,547 hours throughout the evaluation period. This represents an excellent level of activity and excellent responsiveness to the community service needs of the AA. In addition, 15 PBNA employees demonstrated their leadership and served on the Board of Directors or on committees of these organizations. One employee served as a board chairperson for the Marietta Chamber of Commerce a private business association that works throughout the Washington County (Ohio) and Wood County (WV) with a focus on small business development. Additionally the bank collaborated with the Ely Chapman Education Foundation a non-profit organization whose mission is to provide enrichment

programs for the community at large, including hands on learning, and job training for individuals with diverse backgrounds. Ely Chapman also provides financial education for LMI youth. The bank also provided financial literacy classes or workshops at local high schools and colleges in the AA.

PBNA offers free check cashing for Mountaineer cardholders, a food stamp debit card program that allows cash advances at no charge or fees charged with ATM debit transactions. The bank also offers various other free of charge check cashing services for both customers and no-customers.

State of West Virginia

CRA Rating for West Virginia:	Satisfactory
The lending test is rated:	High Satisfactory
The investment test is rated:	Needs to Improve
The service test is rated:	Outstanding

The major factors that support this rating include:

- An excellent level of lending activity for home mortgage loans and small loans to businesses;
- A good geographic distribution of home mortgage loans and small loans to businesses;
- An adequate distribution, based on borrower income level, of home mortgage and small loans to businesses;
- A neutral level of CD loans that were responsive to community needs;
- A poor level of CD investments and donations;
- A branch distribution that is readily accessible to LMI geographies and individuals; and
- A good level of CD services that were responsive to community needs.

Description of Institution's Operations in West Virginia

PBNA has one AA within the state of West Virginia. The West Virginia Non-MSA, which is comprised of Mason, Tyler, and Wetzel counties. In 2012, PBNA expanded their branch network to include Sistersville town within Tyler, WV. The revised delineation of the WV Non-MSA assessment area added all tracts in Tyler County. As of June 30, 2013, bank deposits in the West Virginia Non-MSA totaled \$183.4 million. This represents 12.7 percent of PBNA's total deposits. Ranked by deposits, the West Virginia Non-MSA is the second largest rating area for the bank. In terms of deposit market share, PBNA ranks number one out of the ten depository institutions in the AA. Within this assessment area, the bank operates five branches (11.90 percent of the bank's total branch network) and three deposit-taking ATMs.

Refer to the market profile for the state of West Virginia in appendix C for detailed demographics and other performance context information for assessment areas that received full-scope reviews.

Scope of Evaluation in West Virginia

PBNA has one AA in the State of West Virginia, the West Virginia Non-MSA. As a result, we performed a full-scope review on the West Virginia Non-MSA.

LENDING TEST

Conclusions for Areas Receiving Full-Scope Reviews

The bank's performance under the lending test in West Virginia is rated "High Satisfactory." Based on a full-scope review, the bank's performance in the West Virginia Non-MSA is good.

Lending Activity

Refer to Tables 1 Lending Volume and 1 Other in West Virginia section of appendix D for the facts and data used to evaluate the bank's lending activity.

Lending activity in the West Virginia Non-MSA is excellent, considering the strong competition for all types of loans in the bank's AA. In the AA, PBNA had a deposit market share of 25.17 percent as of June 30, 2013, and ranked first among 10 depository institutions. Competition for home purchase lending was strong, with 46 lenders in the AA. PBNA ranked eleventh in home purchase lending with a 4.22 percent market share. Home refinance lending is also competitive with 49 lenders in the AA. PBNA ranked first in home refinance lending with a 13.45 percent market share. Due to an insufficient number of loans, multifamily, home improvement and small business lending were not evaluated.

Due to an insufficient number of loans, small business lending was not evaluated.

Distribution of Loans by Income Level of the Geography

Overall, PBNA geographic distribution of loans in the West Virginia Non-MSA is good. In performing our analysis, we placed greater weight on the bank's home mortgage lending as home mortgage loans represented the majority of the bank's CRA reportable lending activity. Within home mortgage lending, more weight was given to refinance loans based on amount of originations during the evaluation period. Additionally, equal weight was given to 2010 through 2013 performance years.

Home Mortgage Loans

Refer to Tables 2, 3, 4, and 5 in the West Virginia Non-MSA section of appendix D for the facts and data used to evaluate the geographic distribution of the bank's home mortgage loan originations and purchases.

The overall geographic distribution of home purchase loans is very poor. In 2012 and 2013, the geographic distribution of home purchase loans was very poor. In the low-income geographies, the percentage of owner-occupied units was less than 1 percent; therefore, an analysis was not meaningful. The percentage of loans in moderate-income geographies was significantly below the percentage of owner-occupied units in these geographies. People's market share during the period was very poor. The bank's market share in both LMI geographies was significantly below the overall market share. During the 2010 and 2011 performance years, the bank did not originate or purchase a sufficient number of loans for a meaningful analysis.

The overall geographic distribution of home improvement loans was not evaluated. During the evaluation period, 2010 through 2013 performance years, the bank did not originate or purchase a sufficient number of loans for a meaningful analysis.

The overall geographic distribution of home refinance loans is good. The bank's geographic distribution of home refinance loans during 2012 through 2013 was good. In the low-income geographies, the percentage of owner-occupied units was less than 1 percent; therefore, an analysis was not meaningful. The percentage of loans in moderate-income geographies exceeded the percentage of owner-occupied units in these geographies. The bank's market share during this period was adequate. The bank's market share in the low-income geographies was significantly below the overall market share in these geographies. The bank's market share in the moderate-income geographies exceeded the overall market share in these geographies. During the 2010 and 2011 performance years, the bank did not originate or purchase a sufficient number of loans for a meaningful analysis.

The bank did not originate or purchase a sufficient number of multifamily loans for a meaningful analysis.

Small Loans to Businesses

Refer to Table 6 in the West Virginia Non-MSA section of appendix D for the facts and data used to evaluate the geographic distribution of the bank's origination/purchase of small loans to businesses.

The overall geographic distribution of small loans to businesses was not evaluated. During the evaluation period, 2010 through 2013 performance years, the bank did not originate or purchase a sufficient number of loans for a meaningful analysis.

Lending Gap Analysis

We reviewed summary reports, maps, analyzed PBNA's home mortgage, and small business lending activity over the evaluation period to identify any gaps in the geographic distribution of loans. We did not identify any unexplained conspicuous gaps.

Distribution of Loans by Income Level of the Borrower

Home Mortgage Loans

Overall, PBNA borrower distribution of loans in the West Virginia Non-MSA MMSA AA is adequate. In performing our analysis, we placed greater weight on the bank's home mortgage lending as home mortgage loans represented the majority of the bank's CRA reportable lending activity. Within home mortgage lending, more weight was given to refinance loans based on amount of originations during the evaluation period. Additionally, equal weight was given to 2010 through 2013 performance years.

Refer to Tables 8, 9, and 10 in the West Virginia Non-MSA section of appendix D for the facts and data used to evaluate the borrower distribution of the bank's home mortgage loan originations and purchases.

The overall borrower distribution of home purchase loans is adequate. The bank's borrower distribution of home purchase loans during 2012 through 2013 was adequate. The percentage of home purchase loans to low-income borrowers was well below the percentage of such families. The portion of loans to

moderate-income borrowers exceeded the percentage of moderate-income families. The bank's market share during the period was very poor. The bank's market share to low-income borrowers was significantly below the overall market share. The bank's market share to moderate-income borrowers was well below the overall market share. The bank's borrower distribution of home purchase loans during 2010 through 2011 was stronger and considered good due to stronger performance, particularly in low-income geographies.

The overall geographic distribution of home improvement loans was not evaluated. During the evaluation period, 2010 through 2013 performance years, the bank did not originate or purchase a sufficient number of loans for a meaningful analysis.

The overall borrower distribution of home refinance loans is adequate. The bank's borrower distribution of home refinance loans during 2012 through 2013 was adequate. The percentage of home refinance loans to both LMI borrowers was below the percentage of such families. The bank's market share during the period was adequate. The bank's market share to low-income borrowers was well below the overall market share. The bank's market share to moderate-income borrowers exceeded the overall market share. The bank's borrower distribution of home refinance loans during 2010 through 2011 was stronger and considered good due to stronger performance in both LMI geographies.

Small Loans to Businesses

Refer to Table 11 in the West Virginia Non-MSA section of appendix D for the facts and data used to evaluate the borrower distribution of the bank's origination/purchase of small loans to businesses.

The overall borrower distribution of small loans to businesses is excellent. The bank's borrower distribution of small loans to businesses in 2012 through 2013 was not evaluated. During the 2012 through 2013 performance years, the bank did not originate or purchase a sufficient number of loans for a meaningful analysis. However, the bank's borrower distribution of small loans to businesses in the 2010 through 2011 performance years was excellent. This performance was enhanced by an excellent market share.

Community Development Lending

Refer to Table 1 Lending Volume in the West Virginia Non-MSA section of appendix D for the facts and data used to evaluate the bank's level of community development lending. This table includes all community development loans, including multifamily loans that also qualify as community development loans. In addition, Table 5 includes geographic lending data on all multi-family loans, including those that also qualify as community development loans. Table 5 does not separately list community development loans, however.

PBNA made two Community Development loans totaling \$45 thousand within the West Virginia Non-MSA AA during the evaluation period. Considering the size of the AA, this level of activity has a neutral impact on the lending test rating for the State of Ohio.

PBNA funded a \$35 thousand LOC with Wetzel County Center for Children and Families, Inc. The LOC is used for short-term working capital. Wetzel County Center for Children and Families, Inc. assists LMI clients with the services they require such as clothing and help with utility bills.

PBNA also funded a \$10 thousand LOC with Wetzel County Family Resource Network, Inc. The LOC purpose is for working capital. The Wetzel County Family Resource Network is a children's and family organization that serves only LMI individuals in the area. They focus on adult and children counseling, job training, education, financial aid and rehabilitation. Funding comes from the West Virginia Department of Health and Human Resources Department.

Product Innovation and Flexibility

PBNA offers a standard product mix of loans including USDA guaranteed, SBA, FHA, and Rural Housing loans throughout all of its assessment areas. The bank's loan product flexibility had a neutral impact on its Lending conclusions. PBNA offers the following flexible loan programs targeted to low- and moderate income borrowers. Loans originated under these programs are included in the bank's home mortgage loans and loans to small businesses and are analyzed under other portions of the Lending Test.

- PBNA offers, through the U.S. Department of Agriculture's Rural Housing Section 502 guaranteed loan program. This is a flexible financing option that features no down payment requirements, where loan proceeds can be used to construct, purchase, and rehabilitate single family homes. The majority of the loans made by PBNA under this program were to low- or moderate-income areas. During the evaluation period, the bank made \$369 thousand in loans to borrowers within the AA.

INVESTMENT TEST

Conclusions for Areas Receiving Full-Scope Reviews

The bank's performance under the investment test in West Virginia Non-MSA is rated ("Needs to Improve"). Based on a full-scope review, the bank's performance in the West Virginia Non-MSA is poor.

Refer to Table 14 in the West Virginia Non-MSA section of appendix D for the facts and data used to evaluate the bank's level of qualified investments.

During the evaluation period, PBNA made four investments in the West Virginia Non-MSA totaling \$352 thousand and contributed numerous donations totaling \$42 thousand. There were no investments made prior to the current evaluation period that affected the AA.

The total investments and donations represent 1.48 percent of allocated Tier One Capital for the AA. This level is considered poor, and is commensurate with the low percentage of deposits at 12.72 percent of total deposits in the West Virginia market. One bank donation in the AA was a maintenance vehicle to the Crosslight of Hope, a food, clothing and outreach ministry.

In terms of total dollar volume, \$218 thousand (or 89.72 percent) of the bank's investments and donations for the AA are for West Virginia State Housing Development Bonds. This fund is a public body that was established to increase the supply of residential housing for persons and families of low and moderate-income and to provide construction and permanent mortgage financing to public and private sponsors of such housing. PBNA also invested \$25 thousand for the Mason County School Bonds. This investment was to renovate and make additions to several schools in a district that has

majority low to moderate-income students. The majority of the county was designated as distressed middle income during most of the evaluation period.

SERVICE TEST

Conclusions for Areas Receiving Full-Scope Reviews

The bank's performance under the Service Test in West Virginia is "Outstanding." Based on a full scope review, the bank's performance in West Virginia Non-MSA is excellent.

Retail Banking Services

Refer to Table 15 in the West Virginia Non-MSA section of appendix D for the facts and data used to evaluate the distribution of the bank's branch delivery system and branch openings and closings.

The distribution of bank branches is excellent in the West Virginia Non-MSA, as they are readily accessible to all portions of the full scope area. There are no low-income geographies in the West Virginia Non-MSA. The percentage of bank branches in moderate-income geographies was significantly below the percentage of the population residing in those geographies. After considering the bank branch located in middle-income distress tract, the percentage of bank branches exceeded the percentage of the population residing in those geographies. PBNA did not open or close any bank branches within the LMI geographies.

PBNA offered a full range of loan and deposit products and the services offered at each branch are generally consistent and do not vary in a way that would inconvenience portions of the AA. Branch hours are standard and include weekdays and Saturday hours.

Community Development Services

Performance in addressing the CD needs of the West Virginia Non-MSA was good. In the West Virginia Non-MSA, five PBNA employees provided their expertise to 15 different CD organizations for a total of 464 hours throughout the evaluation period. This represents a good level of activities and good responsiveness to the needs of the community. Working with these organizations, PBNA employees held several educational sessions throughout the evaluation period at local high schools and vocational schools in the AA.

Additionally, two PBNA employees provided leadership skills by serving on the Board of Directors or executive committee members for eight organizations totaling 332 volunteer hours.

PBNA offers free check cashing for Mountaineer cardholders, a food stamp debit card program that allows cash advances at no charge or fees charged with ATM debit transactions. The bank also offers various other free of charge check cashing services for both customers and no-customers.

State of Ohio

CRA Rating for Ohio:	Satisfactory
The lending test is rated:	High Satisfactory
The investment test is rated:	Outstanding
The service test is rated:	High Satisfactory

The major factors that support this rating include:

- An good level of lending activity for home mortgage loans and small loans to businesses;
- A good geographic distribution of home mortgage loans and small loans to businesses;
- An good distribution, based on borrower income level, of home mortgage and small loans to businesses;
- A significantly positive and neutral level of CD loans that were responsive to community needs in the Columbus and Ohio Non-MSA AAs respectively;
- An excellent level of CD investments and donations;
- A branch distribution that is readily accessible to LMI geographies and individuals; and
- A good level of CD services that was responsive to community needs.

Description of Institution's Operations in Ohio

PBNA has two AAs within the state of Ohio. These AAs include the Columbus MSA, comprised of Fairfield County, and the Ohio Non-MSA, comprised of eight counties: Gallia, Meigs, Athens, Morgan, Noble, Guernsey, Muskingum and portions of Hocking County. As of June 30, 2013, bank deposits in the state of Ohio totaled \$509.2 million. This represents 37.40 percent of PBNA's total deposits. The Columbus MSA and Ohio Non-MSA represent 3.8 percent and 33.6 percent to total deposits, respectively. Ranked by deposits, the Ohio Non-MSA rating area is the second largest rating area for the bank. In terms of deposit market share for the state of Ohio, PBNA ranks twenty-two with a 0.41 percent of the market share. Within the Columbus MSA, the bank operates three branches and three deposit-taking ATMs. Within the Ohio Non-MSA, the bank operates twenty-one branches and ten deposit-taking ATMs. The Ohio branches represent 60 percent of the bank's total branch network.

Refer to the market profile 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 West Virginia

PBNA has two AA in the State of Ohio, the Columbus MSA and the Ohio Non-MSA. As a result, we performed a full-scope review both.

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 Columbus MSA and OH Non-MSA is good.

Lending Activity

The bank's overall lending activity in the state of Ohio is good, considering that strong competition for all types of loans in the bank's AAs. The bank's good performance in originating home mortgage loans and small business loans when compared to its local competitors supports this conclusion.

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

Columbus MSA

Lending activity in the Columbus MSA is adequate, considering the competition for all types of loans in the bank's AA. In the AA, PBNA had a deposit market share of 3.60 percent as of June 30, 2013, and ranked sixteenth among 28 depository institutions. Competition for home purchase lending was strong, with 200 lenders in the AA. PBNA ranked seventy-second in home purchase lending with a 0.21 percent market share. For home improvement lending, the bank ranked twenty-sixth with a 0.52 percent market share. Home refinance lending is also competitive with 225 lenders in the AA. PBNA ranked fifty-sixth in home refinance lending with a 0.23 percent market share. Due to an insufficient number of loans, multifamily lending was not evaluated.

Small business lending is highly competitive in the AA. PBNA ranked eighteenth out of 46 total lenders for small business lending, with a market share of 0.79 percent. The top five lenders control a majority of the market with a combined market share of 57.92 percent.

OH Non-MSA

Lending activity in the OH Non-MSA is good, considering the strong competition for all types of loans in the bank's AA. In the AA, PBNA had a deposit market share of 70.0 percent as of June 30, 2013, and ranked first among 47 depository institutions. Competition for home purchase lending was strong, with 200 lenders in the AA. PBNA ranked fourth in home purchase lending with a 4.79 percent market share. For home improvement lending, the bank ranked third with a 6.28 percent market share. Home refinance lending is also competitive with 234 lenders in the AA. PBNA ranked tenth in home refinance lending with a 3.62 percent market share. Due to an insufficient number of loans, multifamily lending was not evaluated.

Small business lending is highly competitive in the AA. PBNA ranked eleventh out of 53 total lenders for small business lending, with a market share of 5.38 percent. The top five lenders control a majority of the market with a combined market share of 55.37 percent.

Distribution of Loans by Income Level of the Geography

Overall, the geographic distribution of the bank's lending is good. In performing our analysis, we placed greater weight on the bank's home mortgage lending as home mortgage loans represented the majority of the bank's CRA reportable lending activity. Within home mortgage lending, more weight was given to refinance loans based on amount of originations during the evaluation period. Additionally, equal weight was given to 2010 through 2013 performance years.

Home Mortgage Loans

Refer to Tables 2, 3, 4, and 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 home mortgage loan originations and purchases.

Columbus MSA

The overall geographic distribution of home purchase loans is good. In 2012 and 2013, the geographic distribution of home purchase loans was good. In the low-income geographies, the percentage of owner-occupied units was less than 1 percent; therefore, an analysis was not meaningful. The percentage of loans in moderate-income geographies was near the percentage of owner-occupied units in these geographies. Overall market share was less than 1 percent; therefore, an analysis was not meaningful. During the 2010 and 2011 performance years, the bank did not originate or purchase a sufficient number of loans for a meaningful analysis.

The bank did not originate or purchase a sufficient number of home improvement loans for a meaningful analysis.

The overall geographic distribution of home refinance loans is good. The bank's geographic distribution of home refinance loans during 2012 through 2013 was excellent. In the low-income geographies, the percentage of owner-occupied units was less than 1 percent; therefore, an analysis was not meaningful. The percentage of loans in moderate-income geographies exceeded the percentage of owner-occupied units in these geographies. Overall market share was less than 1 percent; therefore, an analysis was not meaningful. The bank's geographic distribution of home refinance loans during 2010 through 2011 was weaker and considered adequate due to weaker performance, particularly in moderate-income geographies.

The bank did not originate or purchase a sufficient number of multifamily loans for a meaningful analysis.

OH Non-MSA

The overall geographic distribution of home purchase loans is good. In 2012 and 2013, the geographic distribution of home purchase loans was good. In the low-income geographies, the percentage of owner-occupied units was less than 1 percent; therefore, an analysis was not meaningful. The percentage of loans in moderate-income geographies was near the percentage of owner-occupied units in these geographies. The bank's market share during this period was adequate. The bank's market share in the low-income geographies was significantly below the overall market share. The bank's market share in the moderate-income geographies exceeded the overall market share. The bank's geographic

distribution of home purchase loans during 2010 through 2011 was stronger and considered excellent due to stronger performance, particularly in moderate geographies.

The overall geographic distribution of home improvement loans is good. The bank's geographic distribution of home improvement loans in 2012 and 2013 was excellent. In the low-income geographies, the percentage of owner-occupied units was less than 1 percent; therefore, an analysis was not meaningful. The percentage of loans in moderate-income geographies exceeded the percentage of owner-occupied units in these geographies. The bank's market share during this period was good. The bank's market share in the low-income geographies was significantly below the overall market share. The bank's market share in the moderate-income geographies exceeded the overall market share. The bank's geographic distribution of home improvement loans during 2010 through 2011 was somewhat weaker and considered good due to a weaker market share.

The overall geographic distribution of home refinance loans is good. The bank's geographic distribution of home refinance loans in 2012 and 2013 was excellent. In the low-income geographies, the percentage of owner-occupied units was less than 1 percent; therefore, an analysis was not meaningful. The percentage of loans in moderate-income geographies exceeded the percentage of owner-occupied units in these geographies. The bank's market share during this period was excellent. The bank's market share in both LMI geographies exceeded the overall market share. The bank's geographic distribution of home refinance loans during 2010 through 2011 was somewhat weaker and considered good due to a weaker market share.

The bank did not originate or purchase a sufficient number of multifamily loans for a meaningful analysis.

Small Loans to Businesses

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

Columbus MSA

The overall geographic distribution of small loans to businesses is adequate. The percentage of loans in low-income geographies was significantly below the percentage of small businesses to these geographies. The portion of loans in moderate-income geographies was below the percentage of small businesses in these geographies. Overall market share was less than 1 percent; therefore, an analysis was not meaningful. The bank's geographic distribution of small loans to businesses during 2010 through 2011 was stronger and considered adequate due to stronger performance, particularly in moderate-income geographies.

OH Non- MSA

The overall geographic distribution of small loans to businesses is adequate. The bank's geographic distribution of small loans to businesses in 2012 through 2013 was poor. The percentage of loans in low-income geographies was significantly below the percentage of small businesses to these geographies. The portion of loans in moderate-income geographies was below the percentage of small businesses in these geographies. The bank's market share was poor. The bank's market share in the low-income geographies was significantly below the overall market share. The bank's market share in

the moderate-income geographies was below the overall market share. The bank's geographic distribution of small loans to businesses during 2010 through 2011 was stronger and considered good due to stronger performance, particularly in moderate-income geographies.

Lending Gap Analysis

We reviewed summary reports, maps, analyzed PBNA's home mortgage, and small business lending activity over the evaluation period to identify any gaps in the geographic distribution of loans. We did not identify any unexplained conspicuous gaps.

Distribution of Loans by Income Level of the Borrower

Home Mortgage Loans

Overall, PBNA borrower distribution of loans in the state of Ohio is good. In performing our analysis, we placed greater weight on the bank's home mortgage lending as home mortgage loans represented the majority of the bank's CRA reportable lending activity. Within home mortgage lending, more weight was given to refinance loans based on amount of originations during the evaluation period. Additionally, equal weight was given to 2010 through 2013 performance years.

Refer to Tables 8, 9, and 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 home mortgage loan originations and purchases.

Columbus MSA

The overall borrower distribution of home purchase loans is good. The bank's borrower distribution of home purchase loans during 2012 through 2013 was good. The percentage of home purchase loans to low-income borrowers was near the percentage of such families. The portion of loans to moderate-income borrowers exceeded the percentage of moderate-income families. Overall market share was less than 1 percent; therefore, an analysis was not meaningful. During the 2010 and 2011 performance years, the bank did not originate or purchase a sufficient number of loans for a meaningful analysis.

The overall borrower distribution of home improvement loans was not evaluated. During the evaluation period, 2010 through 2013 performance years, the bank did not originate or purchase a sufficient number of loans for a meaningful analysis.

The overall borrower distribution of home refinance loans is good. The bank's borrower distribution of home refinance loans during 2012 through 2013 was good. The percentage of home refinance loans to low-income borrowers was well below the percentage of such families. The portion of loans to moderate-income borrowers exceeded the percentage of moderate-income families. Overall market share was less than 1 percent; therefore, an analysis was not meaningful. The bank's borrower distribution of home refinance loans during 2010 through 2011 was not inconsistent with the performance noted during 2012 through 2013.

OH Non-MSA

The overall borrower distribution of home purchase loans is good. The bank's borrower distribution of home purchase loans during 2012 through 2013 was good. The percentage of home purchase loans to

low-income borrowers was below the percentage of such families. The portion of loans to moderate-income borrowers exceeded the percentage of moderate-income families. The bank's market share during the period was good. The bank's market share to low-income borrowers exceeded the overall market share. The bank's market share to moderate-income borrowers was near the overall market share. The bank's borrower distribution of home purchase loans during 2010 through 2011 was not inconsistent with the performance noted during 2012 through 2013.

The overall borrower distribution of home improvement loans is good. The bank's borrower distribution of home improvement loans during 2012 through 2013 was good. The percentage of home improvement loans to low-income borrowers was below the percentage of such families. The portion of loans to moderate-income borrowers exceeded the percentage of moderate-income families. The bank's market share during the period was good. The bank's market share to low-income borrowers was near the overall market share. The bank's market share to moderate-income borrowers exceeded the overall market share. The bank's borrower distribution of home improvement loans during 2010 through 2011 was not inconsistent with the performance noted during 2012 through 2013.

The overall borrower distribution of home refinance loans is good. The bank's borrower distribution of home improvement loans during 2012 through 2013 was good. The percentage of home refinance loans to low-income borrowers was well below the percentage of such families. The portion of loans to moderate-income borrowers exceeded the percentage of moderate-income families. The bank's market share during the period was good. The bank's market share to low-income borrowers was below the overall market share. The bank's market share to moderate-income borrowers exceeded the overall market share. The bank's borrower distribution of home refinance loans during 2010 through 2011 was not inconsistent with the performance noted during 2012 through 2013.

Small Loans to Businesses

Refer to Table 11 in the Ohio Non-MSA section of appendix D for the facts and data used to evaluate the borrower distribution of the bank's origination/purchase of small loans to businesses.

Columbus MSA

The overall borrower distribution of small loans to businesses is adequate. The bank's borrower distribution of small loans to businesses in 2012 through 2013 was adequate. The percentage of small loans to small businesses (businesses with gross annual revenue of \$1 million or less) was below the percentage of small businesses. Overall market share was less than 1 percent; therefore, an analysis was not meaningful. The bank's performance in 2010 through 2011 was stronger and considered good.

OH Non-MSA

The overall borrower distribution of small loans to businesses is excellent. The bank's borrower distribution of small loans to businesses in 2012 through 2013 was excellent. The percentage of small loans to small businesses (businesses with gross annual revenue of \$1 million or less) exceeded the percentage of small businesses. This performance was enhanced by an excellent market share. The bank's performance in 2010 through 2011 was not inconsistent with the performance noted during 2012 through 2013

Community Development Lending

Refer to Table 1 Lending Volume in the state of Ohio section of appendix D for the facts and data used to evaluate the bank's level of community development lending. This table includes all community development loans, including multifamily loans that also qualify as community development loans. In addition, Table 5 includes geographic lending data on all multi-family loans, including those that also qualify as community development loans. Table 5 does not separately list community development loans, however.

Columbus MSA

PBNA's level of CD lending had a significantly positive impact on its overall lending performance in the Columbus MSA AA. PBNA reported five loans totaling \$1.76 million to organizations and companies that provide community services targeted to LMI individuals, promotion of economic development, and activities that revitalize/stabilize LMI geographies. The total outstanding dollar amount represents 24.45 percent of allocated capital. The CD loans originated during this evaluation period are detailed below:

PBNA originated a \$750 thousand operating LOC with the Fairfield Community Health Center (FCHC). FCHC is a Federally Qualified Health Center (FQHC) that provides medical related services to individuals regardless of ability to pay.

PBNA funded a \$200 thousand LOC with Habitat for Humanity of Fairfield County. The purpose of the loan is for habitat for Humanity to use as working capital during construction phases of new homes for clients. Habitat for Humanity provides affordable housing for LMI clients.

PBNA funded a \$36 thousand equipment loan with the Fairfield Community Health Center. The loan purpose was to purchase and install a new communications system and related equipment for four office locations. Fairfield Community Health Center services are provided to all individuals and none is denied access due to ability to pay. They are a healthcare facility that services those of low to moderate income.

OH Non-MSA

PBNA made 15 CD loans totaling \$8.03 million within the Ohio Non-MSA AA during the evaluation period. Considering the size of the AA, this level of activity has a neutral impact on the lending test rating for the Ohio Non-MSA AA. The bank's CD lending activity of most significance is summarized below:

A \$1.5million loan was made to Muskingum Valley Health Center (MVHC), which is a Federal Qualified Health Center (FQHC). MVHC provides affordable quality healthcare to community members. MVHC provides discounted services based on each individuals financial situation. They also provide access to healthcare for individuals that are unable to afford services. The corporate mission includes establishing and operating Health centers for medically indigent persons.

A \$2.36 million working capital and expansion loan was made to a LMI healthcare provider, Genesis Healthcare Systems. They want to expand the number of physicians due to a county assessment indicating a shortfall of 84 physicians. The hospital provides free healthcare for the indigent and

community services that include screenings, rehabilitation therapy, and long term care for reduced and sometimes zero cost.

A \$1.04 million loan was made to a community action group that focuses on economic development. The loan proceeds were used to purchase a rural industrial park with the goal of attracting businesses to the county and the creation of jobs. The project includes Ohio Department of Development Loan, Rural Development Initiative Grant, and Federal ARC Funds.

Conclusions for Areas Receiving Limited-Scope Reviews

Based on limited-scope review in the Cleveland MSA, the bank's performance under the lending test is weaker than the bank's overall "High Satisfactory" performance under the service test in Ohio. The weaker performance in the Cleveland MSA did not materially impact our overall service conclusions for Ohio. Refer to Table 15 for the state of Ohio in appendix D for the facts and data that supports this conclusion.

Product Innovation and Flexibility

PBNA offers a standard product mix of loans including USDA guaranteed, SBA, FHA, and Rural Housing loans throughout all of its assessment areas. The bank's loan product flexibility had a positive impact on its Lending conclusions. PBNA offers the following flexible loan programs targeted to low- and moderate income borrowers. Loans originated under these programs are included in the bank's home mortgage loans and loans to small businesses and are analyzed under other portions of the Lending Test.

- PBNA offers, through the U.S. Department of Agriculture's Rural Housing Section 502 guaranteed loan program. This is a flexible financing option that features no down payment requirements, where loan proceeds can be used to construct, purchase, and rehabilitate single family homes. The majority of the loans made by PBNA under this program were to low- or moderate-income areas. During the evaluation period, the bank made \$10.9 million in loans to borrowers within the AA.
- Loans were made through Ohio Housing Authority's First Time Homebuyer program. This program feature flexible financing that include below market interest rates and low fee loans. The majority of the loans made by PBNA under this program were to low- or moderate-income borrowers or to borrowers located in low- or moderate-income areas. During the evaluation period, the bank made \$317 thousand within the AA.
- Additionally the bank also made \$438 thousand in Federal Housing Association loans to low- and moderate-income borrowers.

INVESTMENT TEST

Conclusions for Areas Receiving Full-Scope Reviews

The bank's performance under the investment test is rated "Outstanding." Based on full-scope reviews, the bank's performance in the Columbus MSA is excellent. Performance in the Ohio Non-MSA, which comprises 70.02 percent of total deposits in Ohio, is excellent.

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

Columbus MSA

During the evaluation period, PBNA made six investments in the Columbus AA totaling \$2.27 million and contributed numerous donations totaling \$37 thousand. In addition, two prior period investments remained outstanding at the end of the evaluation period, with a book value of \$200 thousand. When considering both the current and prior period investments, the total represents 32.98 percent of allocated Tier One Capital for the AA. This level of investments is considered excellent performance.

The bank's responsiveness to the CD needs in the AA is excellent. In terms of total dollar volume, 71.24 percent of the bank's investments and donations in the AA included GNMA Mortgage Backed Securities backed by housing loans to low and moderate-income individuals in the AA. In addition, a \$3 million prior period investment was made in the Ohio Equity Fund involving Low Income Housing Tax Credits (LIHTCs). This investment was fully funded by PBNA in late 2014. PBNA also invested \$92 thousand in the Ohio Housing Finance Agency Bond. The sale and use of proceeds from bonds was used for rural housing loans and other home programs to increase affordable housing options for Ohio residents.

Ohio Non-MSA

During the evaluation period, PBNA made six investments in the Ohio Non-MSA totaling \$3.30 million and contributed numerous donations totaling \$283 thousand. In addition, two prior period investments remained outstanding at the end of the evaluation period, with a book value of \$670 thousand. When considering both current and prior period investments, the total represents approximately 6.39 percent of allocated Tier One Capital for the AA. This is an excellent level of investments.

The bank has excellent responsiveness to the CD needs in the AA. PBNA purchased GNMA Mortgage Backed Securities, which included a pool of various AAs. In terms of dollar volume, 36.24 percent of the Bank's investments and donations included GNMA Mortgage Backed Securities backed by housing loans to low and moderate-income individuals in the AA. PBNA had adequate responsiveness to affordable housing and economic development needs in the AA. The following are examples of these investments:

A \$3 million Ohio Equity Fund was included as a prior period investment involving Low Income Housing Tax Credits (LIHTCs). This investment was fully funded by PBNA in late 2014. (This was a different investment from the one made in the Columbus AA.)

PBNA purchased the Guernsey County Low Income Housing Project to support the Mayor Estates project. The bank's investment amount was \$550 thousand.

PBNA purchased a new bond for Gallipolis City Schools to construct and improve school facilities. The \$681 thousand investment is to benefit the school district, which is comprised a majority of low-moderate income (LMI) students.

A new bond purchase for \$872 thousand was completed for The Ohio Housing Finance Agency Bond. Proceeds from the sale of the bonds are used to fund construction loans and mortgage loans at below-market interest rates. Sale and use of the proceeds from the bonds is used for Rural Housing loans and other home program to increase affordable housing opportunities for individuals in the state of Ohio.

Conclusions for Areas Receiving Limited-Scope Reviews

Given the Bank's recent addition of the Cleveland MSA, a limited scope review was completed. Though one investment was made during the period, it was called and therefore not included in our calculations. The performance in the limited-scope AA was not significant enough to affect the overall conclusions in the state. Refer to the Table 14 in the state of Ohio section of appendix D for the facts and data that support these conclusions.

SERVICE TEST

Conclusions for Areas Receiving Full-Scope Reviews

The bank's performance under the service test in the state of Ohio is rated "High Satisfactory." Based on full-scope reviews, the bank's performance in the Columbus MSA is adequate and in the Ohio Non-MSA is excellent.

Retail Banking Services

Refer to Table 15 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.

Columbus MSA

The distribution of bank branches is adequate in the Columbus MSA, as they are reasonably accessible to essentially all portions of the full scope area. The percentage of bank branches in low-income geographies was significantly below the percentage of the population residing in those geographies. The percentage of bank branches in moderate-income geographies exceeded the percentage of the population residing in those geographies. During the evaluation period, PBNA closed one bank branch and opened another within the moderate-income geographies. There was no significant impact on the accessibility of banking services in the Columbus MSA geographies.

PBNA offered a full range of loan and deposit products and the services offered at each branch are generally consistent and do not vary in a way that would inconvenience portions of the AA. Branch hours are standard and include weekdays and Saturday hours.

Ohio Non-MSA

The distribution of bank branches is excellent in the Ohio Non-MSA, as they are readily accessible to all portions of the full scope area. The percentage of bank branches in both LMI geographies exceeded the percentage of the population residing in those geographies. Performance was enhanced by the additional three bank branches located in middle-income distressed geographies. During the evaluation period, PBNA closed three bank branches all in moderate geographies. Considering the bank's

performance, there was no significant impact on the accessibility of banking services in the Ohio Non-MSA. PBNA did not open any new branches.

PBNA offered a full range of loan and deposit products and the services offered at each branch are generally consistent and do not vary in a way that would inconvenience portions of the AA. Branch hours are standard and include weekdays and Saturday hours.

Community Development Services

Columbus MSA

In the four county Columbus MSA, ten PBNA employees and two directors provided their expertise to 11 different CD organizations that support affordable housing, community services, and economic development for a total of 79 hours throughout the evaluation period. Bank employees provided a good level of activities and adequate responsiveness to the affordable housing needs of the community. In addition, three PBNA employees demonstrated their leadership by serving the Board of Directors or on committees of these organizations. One of PBNA directors provided pro bono legal services to the Community Shelter Board, a 501(4) (3) non-profit corporation that caters to homeless shelters and transitional housing programs in central Ohio. The bank also provided workshops for small business owners and economic development support concentrating on attracting new small businesses to Fairfield County.

PBNA offers free check cashing for Mountaineer cardholders, a food stamp debit card program that allows cash advances at no charge or fees charged with ATM debit transactions. The bank also offers various other free of charge check cashing services for both customers and no-customers.

Ohio Non-MSA

In the Ohio Non-MSA, twenty PBNA employees provided their expertise to 30 different CD organizations for a total of 737 hours throughout the evaluation period. This represents a good level of activities and good responsiveness to the needs of the community. Within these organizations, PBNA focused on affordable housing, community services and economic development throughout the evaluation period. The bank provided homebuyer workshops, financial literacy programs for high school students and ID theft/Fraud prevention programs for seniors. In Addition, ten PBNA employees demonstrated leadership in the AA serving on the Board of Directors, executive committee members or as a loaned executive for eleven organizations totaling 441 volunteer hours. This represents a good level of activities and adequate responsiveness to the affordable housing needs of the community.

PBNA offers free check cashing for Mountaineer cardholders, a food stamp debit card program that allows cash advances at no charge or fees charged with ATM debit transactions. The bank also offers various other free of charge check cashing services for both customers and no-customers.

Conclusions for Areas Receiving Limited-Scope Reviews

Based on limited-scope review in the Cleveland MSA, the bank's performance under the service test is weaker than the bank's overall "High Satisfactory" performance under the service test in Ohio. The weaker performance in the Cleveland MSA did not materially impact our overall service conclusions for Ohio. Refer to Table 15 for the state of Ohio in appendix D for the facts and data that supports this conclusion.

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 “full-scope”) and those that received a less comprehensive review (designated by the term “limited-scope”).

Time Period Reviewed	Lending Test (excludes CD loans): (1/1/2010 to 12/31/2013) Investment and Service Tests and CD Loans: (11/23/2010 to 01/05/2015)	
Financial Institution	Products Reviewed	
Peoples Bank, NA (PBNA) Marietta, Ohio	Home mortgage loans, small loans to businesses, community development loans, qualified investments, community development services.	
Affiliate(s)	Affiliate Relationship	Products Reviewed
Peoples Capital Corporation	Holding company subsidiary	Public welfare investments
Peoples Bancorp Foundation	Bank funded	Qualified grants
Peoples Financial Advisors	Bank Division	Community development services
List of Assessment Areas and Type of Examination		
Assessment Area	Type of Exam	Other Information
<u>Multistate MSAs</u> Huntington-Ashland (MSA 26580) Parkersburg-Marietta(MSA 37620)	Full Scope Full Scope	None
<u>State of West Virginia</u> West Virginia Non-MSA	Full Scope	
<u>State of Ohio</u> Columbus (MSA 18140) Ohio Non-MSA Cleveland (MSA 17460)	Full Scope Full Scope Limited Scope	

Appendix B: Summary of Multistate Metropolitan Area and State Ratings

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

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

Appendix C: Market Profiles for Full-Scope Areas

Huntington-Ashland WV-KY-OH MSA 26580

Demographic Information for Full Scope Area: Huntington-Ashland WV-KY-OH MSA 26580 2011						
Demographic Characteristics	#	Low % of #	Moderate % of #	Middle % of #	Upper % of #	NA* % of #
Geographies (Census Tracts/BNAs)	49	6.12	20.41	42.86	30.61	0.00
Population by Geography	183,427	2.96	14.10	48.18	34.76	0.00
Owner-Occupied Housing by Geography	53,071	0.19	10.72	51.98	37.11	0.00
Business by Geography	16,462	7.47	12.41	43.85	36.27	0.00
Farms by Geography	323	0.93	8.05	56.35	34.67	0.00
Family Distribution by Income Level	51,173	20.57	16.44	20.32	42.67	0.00
Distribution of Low and Moderate Income Families throughout AA Geographies	18,938	1.12	20.26	52.70	25.92	0.00
Median Family Income		37,119	Median Housing Value		68,404	
HUD Adjusted Median Family Income for 2011		49,600	Unemployment Rate (2000 US Census)		3.52%	
Households Below Poverty Level		18%				

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

Source: 2000 US Census and 2011 HUD updated MFI

Demographic Information for Full Scope Area: Huntington-Ashland WV-KY-OH MSA 2013						
Demographic Characteristics	#	Low % of #	Moderate % of #	Middle % of #	Upper % of #	NA* % of #
Geographies (Census Tracts/BNAs)	51	7.84	25.49	43.14	23.53	0.00
Population by Geography	182,771	5.31	16.31	51.15	27.23	0.00
Owner-Occupied Housing by Geography	51,050	1.61	12.42	54.64	31.33	0.00
Business by Geography	13,878	10.81	21.54	42.10	25.55	0.00
Farms by Geography	321	2.80	6.85	60.75	29.60	0.00
Family Distribution by Income Level	47,793	20.91	17.58	19.63	41.87	0.00
Distribution of Low and Moderate Income Families throughout AA Geographies	18,398	5.33	23.40	51.78	19.49	0.00
Median Family Income		48,544	Median Housing Value		92,866	
HUD Adjusted Median Family Income for 2013		50,800	Unemployment Rate (2010 US Census)		3.22%	
Households Below Poverty Level		19%				

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

Source: 2010 US Census and 2013 HUD updated MFI

In census years, 2000 and 2010 the Huntington-Ashland AA was comprised of Cabell County in West Virginia, and Boyd County and Greenup County in Kentucky. These counties represent the portion of the Huntington-Ashland, WV-KY-OH MSA where the bank has branch offices. The full MSA is not included since the bank does not have offices in Lawrence County, Ohio or Wayne County, West Virginia. The cities of Huntington and Ashland are the population centers. (The AA meets the requirement of the regulation and does not arbitrarily exclude LMI geographies.)

The bank offers a full range of commercial and consumer loan/deposit products and services. Competition in the assessment area (AA) is moderate, with 21 depository institutions in the market. Competition includes large interstate banks, regional banks, as well as mortgage companies, credit unions, and community banks. Peoples Bank has six branches in the AA, and five deposit-taking ATMs. As of June 30, 2013, Peoples Bank's deposits in the AA totaled \$116 million, which equals 3.32 percent of the market. The bank's deposits rank number 13 out of 28 depository institutions in the AA.

Huntington Federal holds the number one position holding \$400 million or 11.6 percent of total deposits.

The AA is a mix of metropolitan and rural areas along the Ohio River where the states of Ohio, West Virginia, and Kentucky meet. According to the 2000 U.S. Census (activity year 2011), the total population of the AA was 184,427. The distribution of families by income level was 20.57 percent low-income, 16.44 percent moderate-income, 20.32 percent middle-income, and 42.67 percent upper-income. According to the 2010 U.S. Census 2013 HUD updated MFI, the total population of the AA declined somewhat to 182,771 in 2013. The distribution of families by income level in AA was similar with 20.91 percent low-income, 17.58 percent moderate-income, 19.63 percent middle-income, and 41.87 percent upper-income.

Employment and Economic Factors

The AA is in the Appalachian region. The [Appalachian Regional Commission](#) gives each county one of five possible economic designations distressed, at-risk, transitional, competitive, or attainment with "distressed" counties being the most economically endangered and "attainment" counties being the most economically prosperous. Each county in the AA is designated as transitional and each county has pockets of distressed areas in their areas.

Unemployment in the Huntington-Ashland MSA decreased during the evaluation period from 3.52 percent in 2011 (based on the 2000 census) to 3.22 percent in 2013 based on the 2010 census. The decrease in the unemployment percentages coincides with the change in population. Unemployment numbers are well below the national average of 6.7 percent in December 2013. According to the Bureau of Labor Statistics, (<http://beta.bls.gov>) unemployment in the state of West Virginia fell from 7.9 percent in January 2011 to 6.0 percent at year-end 2013. The unemployment rate in Kentucky was 7.9 percent at year-end 2013.

The percentage of families in the AA living below the poverty level is high and increased from 18 percent at the 2000 U.S. Census to 19 percent at the 2010 U.S. Census. The percentage of families below the poverty level for the AA was higher than the national average of 12.2 percent in census year 2000 and 15.3 for census year 2010. LMI geographies increased in percentage from one-quarter in 2011 to one-third of the census tracts in the AA in 2013. LMI geographies increased to 30 percent in 2013 based on the 2010 U.S. Census. The top employers in King's Daughters Medical Center and AK Steel in Boyd County, Our Lady of Bellefonte Hospital in Greenup County and St. Mary's Hospital and Marshall University in West Va.

Housing

Home ownership in the LMI geographies was low with 0.19 percent and 10.7 percent in the low income and moderate-income tracts respectively. This lower level of ownership was low due to high median housing prices paired with a lower moderate-income level. According to the HUD, the median housing value for the AA was \$68,404 in 2011. LMI families earned approximately \$25 thousand and \$40 thousand for low and moderate incomes respectively; based on the 2011 HUD adjusted median income of \$49,600. These income levels made it difficult for LMI borrowers to purchase housing in this AA. The housing mix indicated by the 2000 U.S. Census reports that 63.51 percent of the housing is owner occupied and 27.11 percent of the housing is rental. The majority of the housing units in LMI geographies are rentals units. The total of rentals in LMI totaled 34.5 percent. The middle-income geography had 36.9 percent.

According to the HUD, the median housing value for the AA increased significantly in 2013 to \$92,866. Households below the poverty level increased from 18 percent in 2011 to 19 percent in 2013. Median family income reflected a minimal increase to \$50,800. Incomes for LMI families did increase at the same rate as housing costs. LMI income improved minutely to approximately \$26 thousand for low income and \$41 thousand for moderate income in 2013. There was a minor shift in the housing mix indicated by the 2010 U.S. Census. Both owner-occupied units fell slightly to 60.47 percent while the percentage of rental units increased to 27.75 percent. The change is consistent with the increase in median home values, which dramatically outpaced income growth on the AA. The majority of housing units in LMI geographies remained rental units, increasing to 41.90 percent.

Foreclosures in the MSA ranks 164th for foreclosures out of 366 total metropolitan areas in the US. According to the Center for Housing Policy (www.foreclosure-response.org), the rate foreclosure rate for the AA as of September 2013 (the most recent data) was 37 percent. The serious delinquency rate fluctuated during the evaluation period, ranging from 7.4 percent in September 2012, down to 6.2 percent in September 2013.

Community Contact

We conducted one community contact and reviewed bank information. The organization represented by the community contact was established to help expand the supply of safe, decent and affordable housing to lower-income families. The consortium currently allocates funding for homebuyer assistance, tenant based rental assistance, rental rehabilitation, new construction, and community housing development organizations. The consortium also provides homebuyer education to clients and prepares borrowers for home loans. The contact stated there was a need for safe, affordable rental housing in the area. The contact further stated that there is a need for owner-occupied rehabilitation funds for LMI families to provide repairs and maintenance to their personal residence. The same funding need exists for rental property rehabilitation in LMI communities.

Parkersburg-Marietta MSA

Demographic Information for Full Scope Area: Parkersburg-Marietta MSA Washington-Wood Co 2010-11						
Demographic Characteristics	#	Low % of #	Moderate % of #	Middle % of #	Upper % of #	NA* % of #
Geographies (Census Tracts/BNAs)	16	0.00	12.50	75.00	12.50	0.00
Population by Geography	63,251	0.00	9.95	81.06	8.98	0.00
Owner-Occupied Housing by Geography	19,165	0.00	6.61	83.30	10.09	0.00
Business by Geography	5,454	0.00	19.95	72.90	7.15	0.00
Farms by Geography	275	0.00	6.55	81.82	11.64	0.00
Family Distribution by Income Level	17,766	17.32	19.18	22.01	41.49	0.00
Distribution of Low and Moderate Income Families throughout AA Geographies	6,484	0.00	12.09	82.37	5.54	0.00
Median Family Income HUD Adjusted Median Family Income for 2011 Households Below Poverty Level		40,321 52,500 12%	Median Housing Value Unemployment Rate (2000 US Census)		76,613 3.64%	

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

Source: 2000 US Census and 2011 HUD updated MFI

Demographic Information for Full Scope Area: Parkersburg-Marietta MSA Washington-Wood Co 2012-13						
Demographic Characteristics	#	Low % of #	Moderate % of #	Middle % of #	Upper % of #	NA* % of #
Geographies (Census Tracts/BNAs)	42	0.00	21.43	64.29	14.29	0.00
Population by Geography	148,734	0.00	17.53	67.56	14.91	0.00
Owner-Occupied Housing by Geography	45,520	0.00	13.45	69.85	16.70	0.00
Business by Geography	12,374	0.00	26.01	60.17	13.82	0.00
Farms by Geography	518	0.00	9.85	78.57	11.58	0.00
Family Distribution by Income Level	40,957	20.36	17.53	22.42	39.70	0.00
Distribution of Low and Moderate Income Families throughout AA Geographies	15,516	0.00	22.38	66.28	11.34	0.00
Median Family Income HUD Adjusted Median Family Income for 2013 Households Below Poverty Level		52,293 57,400 15%	Median Housing Value Unemployment Rate (2010 US Census)		105,992 3.78%	

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

Source: 2010 US Census and 2013 HUD updated MFI

The Parkersburg-Marietta MSA was comprised of Wood County in West Virginia and Washington County in Ohio according to the 2000 Census. (The AA meets the requirement of the regulation and does not arbitrarily exclude LMI geographies.)

The bank offers a full range of commercial and consumer loan/deposit products and services. Competition in the AA, Wood County only, is marginal. There are 11 depository institutions in the market. Competition includes a large interstate banks, regional banks, and community banks. Peoples Bank has six branches in the AA, and 14 deposit-taking ATMs. As of June 30, 2013, Peoples Bank's deposits in the AA totaled \$552.5 million, which is 19.46 percent of the market. The bank's deposits

rank number two of 27 depository institutions in the AA. Huntington National Bank holds the number one position holding \$584 million or 20.57 percent of total deposits.

The AA is a mix of metropolitan and rural areas along the Ohio and West Virginia border. The cities of Marietta and Parkersburg are the population centers, and Peoples Bank has their headquarters in Marietta. According to the 2000 U.S. Census (activity year 2011), the total population of the AA was 63,251. There are no designated low-income census tracts in the AA. The distribution of families by income level in the AA was 17.32 percent low-income, 19.18 percent moderate-income, 21.01 percent middle-income, and 41.49 percent upper-income. In 2013, the total population of the AA declined to 148,734 according to the 2010 U.S. Census. The distribution of families by income level in 2013 was 20.36 percent low-income, 17.53 percent moderate-income, 22.42 percent middle, and 39.70 percent upper.

Employment and Economic Factors

The unemployment rate in the Parkersburg-Marietta MSA was relatively static during the evaluation period reporting 3.64 percent in 2011 (based on the 2000 census) and 3.78 percent in 2013 based on the 2010 census. Unemployment numbers are well below the national average of 6.7 percent. According to the Bureau of Labor Statistics, (<http://beta.bls.gov>) unemployment in the state of Ohio fell from 9.10 percent in January 2011 to 6.7 percent at year-end 2013. Unemployment for West Virginia fell from 8.3 percent in January 2011 to 6.0 percent over the same period.

The percentage of families in the AA living below the poverty level is moderate increasing from 12 percent at the 2000 U.S. Census to 15 percent at the 2010 U.S. Census. The percentage of families below the poverty level for the AA was comparable to the national averages of 12.2 percent in census year 2000 and 15.3 for census year 2010. LMI geographies account for less than a 25 percent of the census tracts in the AA. There are no designated low-income census tracts in the AA in either census year. Moderate-income geographies were 18.60 percent in 2011 based on the 2000 U.S. Census and increased to 21.43 percent in 2013 based on the 2010 U.S. Census. In Wood County, the leading employment sector is health care and construction. The top employers in Wood County are Camden Clark Memorial Hospital Corporation, St Joseph Hospital of Parkersburg and United Construction Company, Inc.

Housing

There are no low-income geographies in this AA and home ownership in the moderate-income geography was low at 6.61 percent and 13.45 percent in 2011 and 2013 respectively. This lower level of ownership was low due to high median housing prices paired with lower LMI incomes. According to the HUD, the median housing value for the AA was 76,613 in 2011. LMI families earned approximately \$27 thousand and \$42 thousand for low and moderate incomes respectively, based on the 2011 HUD adjusted median income of \$of 57,400 thousand. These income levels made it difficult for LMI borrowers to purchase housing in this AA. The housing mix indicated by the 2000 U.S. Census reports that 67.79 percent of the housing is owner occupied and 23.13 percent of the housing is rental. Twenty four percent of the housing units in LMI geographies are rentals units compared to only 9 percent owner occupied. The greatest percentage of owner occupied and rental occupied housing is in the moderate-income geography with 77 percent owned and 69 percent rental.

According to the HUD, the median housing value for the AA increased to \$105,992 in 2013. Households below the poverty level increased from 12 percent in 2011 to 15 percent in 2013. The HUD

adjusted median family income also increased to \$57,400. Incomes for LMI families rose slightly over the same period. LMI increased to approximately \$26 thousand for low income and \$42 thousand for moderate income in 2013. There were no significant shifts in the housing mix indicated by the 2010 U.S. Census. Owner-occupied housing units decreased slightly to 66.28 percent and rental occupied housing was essentially unchanged at 23.41 percent. The level of owner occupied and rental occupied housing units increasing slightly to 13 percent and 31 percent each. The greatest percentage of owner occupied and rental occupied housing remains in the moderate-income geography with 70 percent owned and 59.5 percent rental.

Foreclosures in the MSA ranks 191st for foreclosures out of 366 total metropolitan areas in the US. According to the Center for Housing Policy (www.foreclosure-response.org), the foreclosure rate for the AA as of September 2013 (the most recent data) was 3.3 percent. The serious delinquency rate fluctuated during 2012-2013 (only data available) ranging from 6.5 percent in September 2012, down to 5.7 percent in September 2013.

Community Contact

We met with one community development organization, reviewed bank information, and information from other sources. The organization cited a need for improved access to mortgage, credit card, short-term, and college loans in the area. Additional needs include affordable housing, funding for employment training, and support for financial literacy programs for homebuyers as well as foreclosure prevention counseling.

West Virginia Non-MSA

Demographic Information for Full Scope Area: WV NonMSA 2013						
Demographic Characteristics	#	Low % of #	Moderate % of #	Middle % of #	Upper % of #	NA* % of #
Geographies (Census Tracts/BNAs)	14	0.00	7.14	78.57	14.29	0.00
Population by Geography	53,115	0.00	5.26	83.23	11.51	0.00
Owner-Occupied Housing by Geography	17,191	0.00	5.12	84.08	10.80	0.00
Business by Geography	2,871	0.00	3.45	76.21	20.34	0.00
Farms by Geography	165	0.00	7.88	84.85	7.27	0.00
Family Distribution by Income Level	14,904	20.01	17.75	20.40	41.84	0.00
Distribution of Low and Moderate Income Families throughout AA Geographies	5,627	0.00	7.80	84.81	7.39	0.00
Median Family Income		43,801	Median Housing Value	80,628		
HUD Adjusted Median Family Income for 2013		46,100	Unemployment Rate (2010 US Census)	3.80%		
Households Below Poverty Level		18%				

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

Source: 2010 US Census and 2013 HUD updated MFI

Demographic Information for Full Scope Area: WV Non-MSA 2011						
Demographic Characteristics	#	Low % of #	Moderate % of #	Middle % of #	Upper % of #	NA* % of #
Geographies (Census Tracts/BNAs)	9	0.00	0.00	77.78	22.22	0.00
Population by Geography	43,650	0.00	0.00	82.77	17.23	0.00
Owner-Occupied Housing by Geography	14,189	0.00	0.00	82.70	17.30	0.00
Business by Geography	2,719	0.00	0.00	76.76	23.24	0.00
Farms by Geography	141	0.00	0.00	92.20	7.80	0.00
Family Distribution by Income Level	12,782	20.70	16.53	19.12	43.65	0.00
Distribution of Low and Moderate Income Families throughout AA Geographies	4,759	0.00	0.00	86.09	13.91	0.00
Median Family Income		32,500	Median Housing Value	59,393		
HUD Adjusted Median Family Income for 2011		44,800	Unemployment Rate (2000 US Census)	4.02%		
Households Below Poverty Level		20%				

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

Source: 2000 US Census and 2011 HUD updated MFI

The West Virginia Non-MSA assessment area for Peoples Bank consisted of two Counties in the state of West Virginia, Mason and Wetzel counties according to the 2000 Census. Peoples Bank expanded their branch network in 2012 into Sistersville, WV. The revised delineation of the WV Non-MSA assessment area added all tracts in Tyler County in the WV Non-MSA. The WV Non-MSA consisted of three Counties at year-end 2014. There are no LMI geographies in the AA. (The AA meets the requirement of the regulation and does not arbitrarily exclude LMI geographies.)

The bank offers a full range of commercial and consumer loan/deposit products and services. Competition in the assessment area (AA) is moderate, with 10 total depository institutions. Competition includes large interstate banks, regional banks, as well as credit unions, and community banks. Peoples Bank has five branches in the AA, and three deposit-taking ATMs. As of June 30, 2013, Peoples Bank's deposits in the AA totaled \$183 million, which is 25.17 percent of the market. The bank's deposits rank number one out of the 10 depository institutions in the AA. The next closest depository institutions Wesbanco and Union Bank hold 18.4 and 12.1 percent of total deposits respectively.

The AA is primarily a rural area with villages, townships, and small cities located throughout. According to the 2000 U.S. Census (activity year 2011), the total population of the two county AA was 43,650. The distribution of families by income level was 20.70 percent low-income, 16.53 percent moderate-income 19.12 percent middle-income and 43.65 percent upper-income. The total population of the revised four county AA was 53,115 according to the 2010 U.S. Census and the 2013 HUD updated MFI. The distribution of families by income level in the revised AA was similar with 20.01 percent low-income, 17.75 percent moderate-income, 20.40 percent middle-income and 41.84 percent upper.

Employment and Economic Factors

The AA is in the Appalachian region. The [Appalachian Regional Commission](#) designated each county as "at-risk". Unemployment in the WV Non MSA decreased during the evaluation period from 4.02 percent in 2011 based on the 2000 census to 3.80 percent in 2013 based on the 2010 census. According to the Bureau of Labor Statistics, (<http://beta.bls.gov>) unemployment in the state of West Virginia fell from 8.3 percent in January 2011 to 6.0 percent in December 2013. Unemployment numbers in the AA were below the year-end 2013 state average and the national average of 6.7 percent. The percentage of families in the two county AA living below the poverty level in 2011 was 20 percent according to the 2000 Census.

The expanded AA was slightly less in 2013 at 18 percent according to the 2010 U.S. Census. The percentage of families below the poverty level for the AA was higher than the national average of 12.2 percent in census year 2000 and 15.3 for census year 2010. The leading employment sectors are government, retail, health care, energy and government. The top employers are Pleasant Valley Hospital, Wal-Mart, Indiana Michigan Power, Momentive, Performance Material and Mentor management.

Housing

There were no LMI geographies in this AA for census year 2000 and there are no residential mortgages in the LMI geographies. Middle and upper geographies held 82.77 and 17.23 percent of the population demonstrating that the majority of lending opportunities were in the middle-income geography. Middle-income comprised 82.70 percent of owner occupied housing in 2011. According to the 2000 U.S. Census, 69.66 percent of the total housing units in the AA were owner-occupied and 17.49 percent were rental units, all in middle and upper income tracts. The median housing value for the AA was \$59,393 in 2011. LMI families earned approximately \$22 thousand and \$36 thousand for low and moderate incomes respectively; based on the 2011 HUD adjusted median income of \$44,800. These income levels made it difficult for LMI borrowers to purchase housing in this AA. Census year 2010 was similar to the 2000 census year. The revised AA had no low-income geographies and only 7.14 percent of the AA was moderate. Owner occupied housing in the moderate geography is low at 5.12 percent with 17.75 percent of the families listed as low income. The median housing value for the expanded AA increased significantly to \$80,628 in 2013. While income levels increased marginally. The median family income increased to \$46,100 and when combined with a poverty rate of 18.00 percent made home ownership for LMI families difficult to realize. LMI families earned approximately \$23 thousand for low-income families and \$37 thousand for moderate-income families. According to the 2010 U.S. Census 65.91 percent of the total housing units in the AA were owner-occupied, 16.98 percent were rental units. In 2013, 84.08 percent of owner occupied housing was in middle-income tracts.

Community Contact

We conducted one community contact and reviewed bank information. The organization represented by the community contact focuses on providing emergency needs, education and employment assistance, heating and utility assistance, home acquisition and home repair loans. Their typical clients are the low to moderate-income individuals and families. The organizations stated that the credit needs of the AA include affordable housing, improved access to mortgage, credit card, short-term, and college loans.

Columbus MSA

Demographic Information for Full Scope Area: Columbus MSA Fairfield Co 2010-2011						
Demographic Characteristics	#	Low % of #	Moderate % of #	Middle % of #	Upper % of #	NA* % of #
Geographies (Census Tracts/BNAs)	26	0.00	26.92	50.00	23.08	0.00
Population by Geography	122,759	0.00	23.36	48.81	27.83	0.00
Owner-Occupied Housing by Geography	34,626	0.00	20.31	49.57	30.11	0.00
Business by Geography	11,376	0.00	21.84	44.96	33.19	0.00
Farms by Geography	667	0.00	8.40	65.37	26.24	0.00
Family Distribution by Income Level	34,346	16.71	20.20	24.02	39.07	0.00
Distribution of Low and Moderate Income Families throughout AA Geographies	12,677	0.00	36.30	51.15	12.55	0.00
Median Family Income HUD Adjusted Median Family Income for 2011 Households Below Poverty Level		54,708 66,600 7%	Median Housing Value Unemployment Rate (2000 US Census)		123,698 1.74%	

(*) The NA category consists of geographies that have not been assigned an income classification.
Source: 2000 US Census and 2011 HUD updated MFI

Demographic Information for Full Scope Area: Columbus MSA Fairfield Co 2012-2013						
Demographic Characteristics	#	Low % of #	Moderate % of #	Middle % of #	Upper % of #	NA* % of #
Geographies (Census Tracts/BNAs)	28	0.00	28.57	46.43	25.00	0.00
Population by Geography	146,156	0.00	24.34	43.75	31.92	0.00
Owner-Occupied Housing by Geography	40,877	0.00	20.36	44.65	34.99	0.00
Business by Geography	10,201	0.00	25.47	41.66	32.87	0.00
Farms by Geography	675	0.00	11.26	63.11	25.63	0.00
Family Distribution by Income Level	39,807	19.49	18.74	22.64	39.12	0.00
Distribution of Low and Moderate Income Families throughout AA Geographies	15,220	0.00	35.53	46.61	17.86	0.00
Median Family Income HUD Adjusted Median Family Income for 2013 Households Below Poverty Level		66,337 67,900 10%	Median Housing Value Unemployment Rate (2010 US Census)		163,199 3.52%	

(*) The NA category consists of geographies that have not been assigned an income classification.
Source: 2010 US Census and 2013 HUD updated MFI

Peoples Bank only included Fairfield County in the Columbus MSA. (The AA meets the requirement of the regulation and does not arbitrarily exclude LMI geographies.)

The bank offers a full range of commercial and consumer loan/deposit products and services. Competition in the assessment area (AA) is moderate, with 18 depository institutions in the market. Competition includes large interstate banks, regional banks, as well as mortgage companies, credit unions, and community banks. Peoples Bank has three branches in the AA, and three deposit-taking ATMs. As of June 30, 2013, Peoples Bank's deposits in the AA totaled \$52 million, which is 2.88 percent of the market. The bank's deposits rank number 10 out of 18 depository institutions in the AA.

The Park National holds the number one position holding \$372.8 million or 20.52 percent of total deposits.

The AA is a mix of small suburban cities, townships, and rural areas. According to the 2000 U.S. Census (activity year 2011), the total population of Fairfield County was 122,759. The distribution of families by income level was 16.71 percent low-income, 20.20 percent moderate-income, 24.02 percent middle-income, and 39.07 percent upper-income. According to the 2010 U.S. Census, the total population of the AA was 146,156. The distribution of families by income level in the revised AA was 19.49 percent low-income, 18.74 percent moderate-income, 22.64 percent middle, and 39.12 percent upper.

Employment and Economic Factors

Unemployment in the Columbus MSA increased during the evaluation period from 1.74 percent in 2011 (based on the 2000 census) to 3.52 percent in 2013 based on the 2010 census. Unemployment numbers are well below the national average of 6.7 percent. According to the Bureau of Labor Statistics, (<http://beta.bls.gov>) unemployment in the state of Ohio fell from 9.10 percent in January 2011 to 6.7 percent at year-end 2013.

The percentage of families in the AA living below the poverty level is moderate and increased from 7 percent at the 2000 U.S. Census to 10 percent at the 2010 U.S. Census. LMI geographies account for less than one-third of the census tracts in the AA. While there were no low-income tracts in Fairfield County, moderate-income geographies were 23.36 percent in 2011 based on the 2000 U.S. Census. LMI geographies increased to 24.34 percent in 2013 based on the 2010 U.S. Census. The top employers in Fairfield County are Fairfield Medical Center, Lancaster City Schools and Anchor Hocking Glassware.

Housing

There was no low-income geography in this AA. Home ownership in the moderate-income geography was low at 20.31 percent. This lower level of ownership was low due to high median housing prices paired with a lower moderate-income level. According to the HUD, the median housing value for the AA was 123,698 in 2011. LMI families earned approximately \$33 thousand and \$53 thousand for low and moderate incomes respectively; based on the 2011 HUD adjusted median income of \$66,600. These income levels made it difficult for LMI borrowers to purchase housing in this AA. The housing mix indicated by the 2000 U.S. Census reports that 72.25 percent of the housing is owner occupied and 22.53 percent of the housing is rental. The majority of the housing units in LMI geographies are rental units, totaling 47.54 percent in LMI geographies, and 43.18 percent in middle-income geographies.

According to the HUD, the median housing value for the expanded AA increased to \$163,199 in 2013. Households below the poverty level increased from 7 percent in 2011 to 10 percent in 2013. Median family income also increased slightly to \$67,900. Incomes for LMI families rose minimally to approximately \$34 thousand for low income and \$54 thousand for moderate income in 2013. There were no significant shifts in the housing mix indicated by the 2010 U.S. Census. Both owner-occupied housing and rental occupied units decreased slightly to 69.22 percent and 23.02 percent respectively. The majority of housing units in LMI geographies remained rental units, with the increase totaling 41.25 percent in LMI geographies, and 48.69 percent in middle-income geographies.

Foreclosures in the MSA ranks 85th for foreclosures out of 366 total metropolitan areas in the US. According to the Center for Housing Policy (www.foreclosure-response.org), the serious delinquency

rate for the AA as of September 2013 (the most recent data) was 5.0 percent. The serious delinquency rate fluctuated from 2012 to 2013, ranging from 10.0 percent in September 2012, and down to 8.2 percent in September 2013.

Community Contact

We conducted one community contact and reviewed bank information. The organization represented by the community contact focuses on providing affordable housing for low- income persons. Their typical clients are the working poor, most in low-wage jobs. The organizations stated that the credit needs of the AA include affordable housing and support for financial literacy programs such as homebuyer education. In addition, there is a need for affordable banking services, and affordable retail loan products in the area.

OH Non MSA

Demographic Information for Full Scope Area: OH NonMSA 2010-2011						
Demographic Characteristics	#	Low % of #	Moderate % of #	Middle % of #	Upper % of #	NA* % of #
Geographies (Census Tracts/BNAs)	64	1.56	35.94	56.25	6.25	0.00
Population by Geography	270,696	1.03	32.71	60.15	6.11	0.00
Owner-Occupied Housing by Geography	73,894	0.10	32.88	60.73	6.29	0.00
Business by Geography	22,030	0.65	31.09	60.38	7.87	0.00
Farms by Geography	1,290	0.08	29.46	67.13	3.33	0.00
Family Distribution by Income Level	69,513	24.80	20.47	22.84	31.89	0.00
Distribution of Low and Moderate Income Families throughout AA Geographies	31,466	0.44	41.89	54.07	3.60	0.00
Median Family Income HUD Adjusted Median Family Income for 2011 Households Below Poverty Level		43,801 52,900 18%	Median Housing Value Unemployment Rate (2000 US Census)		72,546 3.71%	

(*) The NA category consists of geographies that have not been assigned an income classification.
Source: 2000 US Census and 2011 HUD updated MFI

Demographic Information for Full Scope Area: OH NonMSA 2012-13						
Demographic Characteristics	#	Low % of #	Moderate % of #	Middle % of #	Upper % of #	NA* % of #
Geographies (Census Tracts/BNAs)	64	4.69	32.81	54.69	7.81	0.00
Population by Geography	275,321	5.35	28.91	58.09	7.65	0.00
Owner-Occupied Housing by Geography	74,058	0.99	28.71	61.56	8.73	0.00
Business by Geography	18,895	2.51	29.08	60.02	8.39	0.00
Farms by Geography	1,431	0.21	21.31	68.06	10.41	0.00
Family Distribution by Income Level	68,940	24.77	19.17	21.17	34.89	0.00
Distribution of Low and Moderate Income Families throughout AA Geographies	30,292	2.55	36.90	56.36	4.19	0.00
Median Family Income HUD Adjusted Median Family Income for 2013 Households Below Poverty Level		52,111 53,000 20%	Median Housing Value Unemployment Rate (2010 US Census)		101,967 4.76%	

(*) The NA category consists of geographies that have not been assigned an income classification.
Source: 2010 US Census and 2013 HUD updated MFI

The Ohio Non-MSA assessment area for Peoples Bank consisted of eight Counties in the state of Ohio: Gallia, Meigs, Athens, Morgan, Noble, Guernsey, Muskingum and portions of Hocking County according to the 2000 Census. (The AA meets the requirement of the regulation and does not arbitrarily exclude LMI geographies.)

The bank offers a full range of commercial and consumer loan/deposit products and services. Competition in the assessment area (AA) is high, with 25 total depository institutions. Competition includes large interstate banks, regional banks, as well as mortgage companies, credit unions, and community banks. Peoples Bank has 21 branches in the AA, and 10 deposit-taking ATMs. As of June 30, 2013, Peoples Bank's deposits in the AA totaled \$457 million, which is 11.57 percent of the market.

The bank's deposits rank number one out of the 25 depository institutions in the AA. The next closest depository institutions The Ohio Valley Bank and Park National hold 10.9 and 10.80 percent of total deposits respectively.

The AA is primarily a rural area with villages, townships, and small cities located throughout. According to the 2000 U.S. Census (activity year 2011), the total population of the eight county AA was 270,696. The distribution of families by income level was 24.80 percent low-income, 20.47 percent moderate-income, 22.84 percent middle-income, and 31.89 percent upper-income. According to the 2010 U.S. Census, the total population was 275,321. The distribution of families by income level changed slightly to 24.77 percent low-income, 19.17 percent moderate-income, 21.17 percent middle, and 34.89 percent upper.

Employment and Economic Factors

The AA is in the Appalachian region. The [Appalachian Regional Commission](#) gives each county one of five possible economic designations distressed, at-risk, transitional, competitive, or attainment with "distressed" counties being the most economically endangered and "attainment" counties being the most economically prosperous. Five counties [Athens](#), Meigs, [Morgan](#), [Noble](#) and [Vinton](#) were designated "distressed" and four counties [Gallia](#), [Guernsey](#), [Jackson](#) and [Monroe](#) were designated "at-risk". No counties were given the "attainment" or "competitive" designations.

Unemployment in the Ohio Non MSA increased during the evaluation period from 3.71 percent in 2011 (based on the 2000 census) to 4.76 percent in 2013 based on the 2010 census. Unemployment numbers are below the national average of 6.7 percent. According to the Bureau of Labor Statistics, (<http://beta.bls.gov>) unemployment in the state of Ohio fell from 9.1 percent in January 2011 to 7.1 percent at year-end 2013.

The percentage of families in the eight county AA living below the poverty level was 18 percent according to 2000 U.S. Census with a slight increase to 20 percent according to the 2010 U.S. Census. The percentage of families below the poverty level for the AA was higher than the national average of 12.2 percent in census year 2000 and 15.3 for census year 2010. LMI geographies account for nearly one-third, of the census tracts in the AA based on the 2010 U.S. Census. The largest industries in the AA include manufacturing, education and health services. The top employers are United Hospital, Longaberger Co, Marietta Memorial, Ohio University, Tuscarawas City, 5B's Embroidery, Eramet and Appalachian Behavioral Healthcare.

Housing

Home ownership in LMI geographies is low due to relatively high median housing prices, lower incomes, and a high poverty rate. According to the HUD, the median housing value for the AA was 72,929 in 2011. The relatively high median home prices coupled with a HUD adjusted median family income of \$52,900 and a poverty rate of 18.00 percent limited home ownership opportunities in LMI geographies. LMI families earned approximately \$26 thousand and \$42 thousand for low and moderate incomes respectively, based on the 2011 median income. These income levels made it difficult for LMI borrowers to purchase housing in this AA. The housing mix indicated by the 2000 U.S. Census reports that 63.71 percent of the housing is owner occupied and 24.89 percent of the housing is rental. The majority of housing units in LMI geographies are rentals units, totaling 37.38 percent in LMI geographies, and 56.31 percent in middle-income geographies.

According to the HUD, the median housing value for the expanded AA was 101,967 in 2013. The higher median home prices coupled with a unchanged median family income of \$53,000 and a poverty rate of 20 percent greater challenges to home ownership opportunities in LMI geographies than in prior years. Incomes for LMI families remained approximately \$26 thousand for low income and \$42 thousand for moderate-income families. These income levels furthered the difficulty for LMI borrowers to purchase housing in this AA. There were no significant shifts in the housing mix indicated by the 2010 U.S. Census. Both owner-occupied housing and rental occupied units decreased slightly to 63.60 percent and 24.47 percent respectively. The majority of housing units in LMI geographies remained rental units, totaling 37.45 percent in LMI geographies, and 56.44 percent in middle-income geographies.

Based on the 2000 U.S. Census, in 2011 the median value of housing in the low-income tract was very high. The average home was valued at \$95,500. These values are higher than the median value for both moderate and middle tracts that have median values of \$55,668 and \$77,739. Home values are highest in the upper income tract at \$112,450. The median gross rent in the low-income tract is the highest in the AA at \$531 per month. The college community in Athens County where Ohio University is located drives the higher home values and higher rents in the low-income tract. In 2013, the AA reported a substantial decline in the median value of housing in the low-income tracts. The median home value in low-income tracts fell to \$32,191 from \$95,500. The median values for both moderate and middle tracts were \$70,382 and \$94,118. Home values remain highest in the upper income tract at \$118,165. The median gross rent in the low-income tract is the lowest in the AA at \$496 per month.

Community Contact

We conducted one community contact and reviewed bank information. The organization represented by the community contact focuses on providing affordable housing for low-income persons. Their typical clients are the working poor, most in low-wage jobs. The organizations stated that the credit needs of the AA include affordable housing and support for financial literacy programs such as homebuyer education. In addition, there is a need for affordable banking services, and affordable retail loan products in the area.

Appendix D: Tables of Performance Data

Content of Standardized Tables

A separate set of tables is provided for each state. All multistate metropolitan areas are presented in one set of tables. References to the “bank” include activities of any affiliates that the bank provided for consideration (refer to appendix A: Scope of the Examination). For purposes of reviewing the lending test tables, the following are applicable: (1) purchased loans are treated as originations/purchases and market share is the number of loans originated and purchased by the bank as a percentage of the aggregate number of reportable loans originated and purchased by all lenders in the MA/assessment area; (2) Partially geocoded loans (loans where no census tract is provided) cannot be broken down by income geographies and, therefore, are only reflected in the Total Loans in Core Tables 2 through 7 and part of Table 13; and (3) Partially geocoded loans are included in the Total Loans and % Bank Loans Column in Core Tables 8 through 12 and part of Table 13. Deposit data are compiled by the FDIC and are available as of June 30 of each year. Tables without data are not included in this PE. [Note: Do not renumber the tables.]

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

- Table 1. Lending Volume** - Presents the number and dollar amount of reportable loans originated and purchased by the bank over the evaluation period by MA/assessment area. Community development loans to statewide or regional entities or made outside the bank’s assessment area may receive positive CRA consideration. See Interagency Q&As __.12 (i) - 5 and - 6 for guidance on when a bank may receive positive CRA consideration for such loans. Refer to the CRA section of the Compliance Policy intranet page for guidance on table placement.
- Table 1. Other Products** - Presents the number and dollar amount of any unreported category of loans originated and purchased by the bank, if applicable, over the evaluation period by MA/assessment area. Examples include consumer loans or other data that a bank may provide, at its option, concerning its lending performance. This is a two-page table that lists specific categories.
- Table 2. Geographic Distribution of Home Purchase Loans** - Compares the percentage distribution of the number of loans originated and purchased by the bank in low-, moderate-, middle-, and upper-income geographies to the percentage distribution of owner-occupied housing units throughout those geographies. The table also presents market share information based on the most recent aggregate market data available.
- Table 3. Geographic Distribution of Home Improvement Loans** - See Table 2.
- Table 4. Geographic Distribution of Home Mortgage Refinance Loans** - See Table 2.

- Table 5. Geographic Distribution of Multifamily Loans** - Compares the percentage distribution of the number of multifamily loans originated and purchased by the bank in low-, moderate-, middle-, and upper-income geographies to the percentage distribution of multifamily housing units throughout those geographies. The table also presents market share information based on the most recent aggregate market data available.
- Table 6. Geographic Distribution of Small Loans to Businesses** - The percentage distribution of the number of small loans (less than or equal to \$1 million) to businesses originated and purchased by the bank in low-, moderate-, middle-, and upper-income geographies compared to the percentage distribution of businesses (regardless of revenue size) throughout those geographies. The table also presents market share information based on the most recent aggregate market data available. Because small business data are not available for geographic areas smaller than counties, it may be necessary to use geographic areas larger than the bank's assessment area.
- Table 7. Geographic Distribution of Small Loans to Farms** - The percentage distribution of the number of small loans (less than or equal to \$500,000) to farms originated and purchased by the bank in low-, moderate-, middle-, and upper-income geographies compared to the percentage distribution of farms (regardless of revenue size) throughout those geographies. The table also presents market share information based on the most recent aggregate market data available. Because small farm data are not available for geographic areas smaller than counties, it may be necessary to use geographic areas larger than the bank's assessment area.
- Table 8. Borrower Distribution of Home Purchase Loans** - Compares the percentage distribution of the number of loans originated and purchased by the bank to low-, moderate-, middle-, and upper-income borrowers to the percentage distribution of families by income level in each MA/assessment area. The table also presents market share information based on the most recent aggregate market data available.
- Table 9. Borrower Distribution of Home Improvement Loans** - See Table 8.
- Table 10. Borrower Distribution of Refinance Loans** - See Table 8.
- Table 11. Borrower Distribution of Small Loans to Businesses** - Compares the percentage distribution of the number of small loans (less than or equal to \$1 million) originated and purchased by the bank to businesses with revenues of \$1 million or less to the percentage distribution of businesses with revenues of \$1 million or less. In addition, the table presents the percentage distribution of the number of loans originated and purchased by the bank by loan size, regardless of the revenue size of the business. Market share information is presented based on the most recent aggregate market data available.
- Table 12. Borrower Distribution of Small Loans to Farms** - Compares the percentage distribution of the number of small loans (less than or equal to \$500,000) originated and purchased by the bank to farms with revenues of \$1 million or less to the percentage distribution of farms with revenues of \$1 million or less. In addition, the table presents the percentage distribution of the number of loans originated and purchased by the bank by loan size,

regardless of the revenue size of the farm. Market share information is presented based on the most recent aggregate market data available.

Table 13. Geographic and Borrower Distribution of Consumer Loans (OPTIONAL) - For geographic distribution, the table compares the percentage distribution of the number of loans originated and purchased by the bank in low-, moderate-, middle-, and upper-income geographies to the percentage distribution of households within each geography. For borrower distribution, the table compares the percentage distribution of the number of loans originated and purchased by the bank to low-, moderate-, middle-, and upper-income borrowers to the percentage of households by income level in each MA/assessment area.

Table 14. Qualified Investments - Presents the number and dollar amount of qualified investments made by the bank in each MA/AA. The table separately presents investments made during prior evaluation periods that are still outstanding and investments made during the current evaluation period. Prior-period investments are reflected at their book value as of the end of the evaluation period. Current period investments are reflected at their original investment amount even if that amount is greater than the current book value of the investment. The table also presents the number and dollar amount of unfunded qualified investment commitments. In order to be included, an unfunded commitment must be legally binding, tracked, and recorded by the bank's financial reporting system.

A bank may receive positive consideration for qualified investments in statewide/regional entities or made outside of the bank's assessment area. See Interagency Q&As __.12 (i) - 5 and - 6 for guidance on when a bank may receive positive CRA consideration for such investments. Refer to the CRA section of the Compliance Policy intranet page for guidance on table placement.

Table 15. Distribution of Branch Delivery System and Branch Openings/Closings - Compares the percentage distribution of the number of the bank's branches in low-, moderate-, middle-, and upper-income geographies to the percentage of the population within each geography in each MA/AA. The table also presents data on branch openings and closings in each MA/AA.

Tables of Performance Data

Tables provided cover the bank's performance from January 1, 2012 through December 31, 2013.

Huntington MMSA

Parkersburg MMSA

State of West Virginia

State of Ohio

Table 1. Lending Volume

LENDING VOLUME		Geography: HUNTINGTON MMSA				Evaluation Period: JANUARY 1, 2012 TO DECEMBER 31, 2013						
Assessment Area (2013):	% of Rated Area Loans (#) in MA/AA*	Home Mortgage		Small Loans to Businesses		Small Loans to Farms		Community Development Loans**		Total Reported Loans		% of Rated Area Deposits in MA/AA***
		#	\$ (000's)	#	\$ (000's)	#	\$ (000's)	#	\$ (000's)	#	\$ (000's)	
Full Review:												
Huntington-Ashland WV-KY-OH MSA 2013	100.00	218	21,227	66	11,269	0	0	17	27,397	284	32,496	100.00

* Loan Data as of December 31, 2013. Rated area refers to either state or multi-state MA rating area.

** The evaluation period for Community Development Loans is from January 01, 2013 to December 31, 2013.

*** Deposit Data as of January 15, 2015. Rated Area refers to either the state, multi-state MA, or institution, as appropriate.

Table 1. Other Products

LENDING VOLUME		Geography: HUNTINGTON MMSA				Evaluation Period: JANUARY 1, 2012 TO DECEMBER 31, 2013								
Assessment Area (2013):	% of Rated Area Loans (#) in MA/AA*	Total Optional Loans**		Small Business Real Estate Secured**		Home Equity**		Motor Vehicle**		Credit Card**		Other Secured Consumer**		% of Rated Area Deposits in AA***
		#	\$ (000's)	#	\$ (000's)	#	\$ (000's)	#	\$ (000's)	#	\$ (000's)	#	\$ (000's)	
Full Review:														
Huntington-Ashland WV-KY-OH MSA 2013	0.00	0	0	0	0	0	0	0	0	0	0	0	0	0.00

* Loan Data as of December 31, 2013. Rated area refers to either state or multi-state MA rating area.

** The evaluation period for Optional Product Line(s) is from January 01, 2012 to December 31, 2013.

*** Deposit Data as of January 15, 2015. Rated Area refers to either the state, multi-state MA, or institution, as appropriate.

Table 1. Other Products

LENDING VOLUME		Geography: HUNTINGTON MMSA		Evaluation Period: JANUARY 1, 2012 TO DECEMBER 31, 2013	
Assessment Area (2013):	Other Unsecured Consumer Loans*		Other Optional Loans*		
	#	\$ (000's)	#	\$ (000's)	
Full Review:					
Huntington-Ashland WV-KY-OH MSA 2013	0	0	0	0	

* The evaluation period for Optional Product Line(s) is from January 01, 2012 to December 31, 2013.

Table 2. Geographic Distribution of Home Purchase Loans

Geographic Distribution: HOME PURCHASE		Geography: HUNTINGTON MMSA				Evaluation Period: JANUARY 1, 2012 TO DECEMBER 31, 2013									
Assessment Area:	Total Home Purchase Loans		Low-Income Geographies		Moderate-Income Geographies		Middle-Income Geographies		Upper-Income Geographies		Market Share (%) by Geography ¹				
	#	% of Total ^{**}	% Owner Occ Units ^{***}	% BANK Loans ^{****}	% Owner Occ Units ^{***}	% BANK Loans	% Owner Occ Units ^{***}	% BANK Loans	% Owner Occ Units ^{***}	% BANK Loans	Over all	Low	Mod	Mid	Upp
Full Review:															
Huntington-Ashland WV-KY-OH MSA 2013	47	100.00	1.61	0.00	12.42	10.64	54.64	59.57	31.33	29.79	1.47	0.00	0.54	1.86	1.20

* Based on 2013 Peer Mortgage Data -- US and PR

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

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

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

Table 3. Geographic Distribution of Home Improvement Loans

Geographic Distribution: HOME IMPROVEMENT		Geography: HUNTINGTON MMSA				Evaluation Period: JANUARY 1, 2012 TO DECEMBER 31, 2013					Market Share (%) by Geography*				
Assessment Area:	Total Home Improvement Loans		Low-Income Geographies		Moderate-Income Geographies		Middle-Income Geographies		Upper-Income Geographies		Overall	Low	Mod	Mid	Upp
	#	% of Total**	% Owner Occ Units***	% BANK Loans****	% Owner Occ Units***	% BANK Loans	% Owner Occ Units***	% BANK Loans	% Owner Occ Units***	% BANK Loans					
Full Review:															
Huntington-Ashland WV-KY-OH MSA 2013	50	100.00	1.61	0.00	12.42	6.00	54.64	58.00	31.33	36.00	5.31	0.00	4.00	5.74	5.07

* Based on 2013 Peer Mortgage Data -- US and PR

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

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

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

Table 4. Geographic Distribution of Home Mortgage Refinance Loans

Geographic Distribution: HOME MORTGAGE REFINANCE		Geography: HUNTINGTON MMSA				Evaluation Period: JANUARY 1, 2012 TO DECEMBER 31, 2013					Market Share (%) by Geography				
Assessment Area:	Total Home Mortgage Refinance Loans		Low-Income Geographies		Moderate-Income Geographies		Middle-Income Geographies		Upper-Income Geographies		Overall	Low	Mod	Mid	Upp
	#	% of Total**	% Owner Occ Units***	% BANK Loans****	% Owner Occ Units***	% BANK Loans	% Owner Occ Units***	% BANK Loans	% Owner Occ Units***	% BANK Loans					
Full Review:															
Huntington-Ashland WV-KY-OH MSA 2013	121	100.00	1.61	0.83	12.42	6.61	54.64	58.68	31.33	33.88	2.08	3.33	1.63	2.57	1.41

* Based on 2013 Peer Mortgage Data -- US and PR

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

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

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

Table 5. Geographic Distribution of Multifamily Loans

Geographic Distribution: MULTIFAMILY		Geography: HUNTINGTON MMSA					Evaluation Period: JANUARY 1, 2012 TO DECEMBER 31, 2013					Market Share (%) by Geography				
Assessment Area:	Total Multifamily Loans		Low-Income Geographies		Moderate-Income Geographies		Middle-Income Geographies		Upper-Income Geographies		Overall	Low	Mod	Mid	Upp	
	#	% of Total**	% of MF Units***	% BANK Loans****	% MF Units***	% BANK Loans	% MF Units***	% BANK Loans	% MF Units***	% BANK Loans						
Full Review:																
Huntington-Ashland WV-KY-OH MSA 2013	0	0.00	20.47	0.00	35.10	0.00	26.80	0.00	17.62	0.00	0.00	0.00	0.00	0.00	0.00	

* Based on 2013 Peer Mortgage Data -- US and PR

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

*** Percentage of Multi Family Units is the number of multi family units in a particular geography divided by the number of multifamily housing units in the area based on 2010 Census information.

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

Table 6. Geographic Distribution of Small Loans to Businesses

Geographic Distribution: SMALL LOANS TO BUSINESSES															Geography: HUNTINGTON MMSA					Evaluation Period: JANUARY 1, 2012 TO DECEMBER 31, 2013				
Assessment Area:	Total Small Business Loans		Low-Income Geographies		Moderate-Income Geographies		Middle-Income Geographies		Upper-Income Geographies		Market Share (%) by Geography*													
	#	% of Total**	% of Businesses***	% BANK Loans	% of Businesses***	% BANK Loans	% of Businesses***	% BANK Loans	% of Businesses***	% BANK Loans	Overall	Low	Mod	Mid	Upp									
Full Review:																								
Huntington-Ashland WV-KY-OH MSA 2013	66	100.00	10.81	4.55	21.54	22.73	42.10	53.03	25.55	19.70	2.04	0.67	1.59	3.13	1.59									

* Based on 2013 Peer Small Business Data -- US and PR

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

*** Source Data - Dun and Bradstreet (2013).

Table 7. Geographic Distribution of Small Loans to Farms

Geographic Distribution: SMALL LOANS TO FARMS															Geography: HUNTINGTON MMSA					Evaluation Period: JANUARY 1, 2012 TO DECEMBER 31, 2013				
Assessment Area:	Total Small Farm Loans		Low-Income Geographies		Moderate-Income Geographies		Middle-Income Geographies		Upper-Income Geographies		Market Share (%) by Geography*													
	#	% of Total**	% of Farms***	% BANK Loans	% of Farms***	% BANK Loans	% of Farms***	% BANK Loans	% of Farms***	% BANK Loans	Overall	Low	Mod	Mid	Upp									
Full Review:																								
Huntington-Ashland WV-KY-OH MSA 2013	0	0.00	2.80	0.00	6.85	0.00	60.75	0.00	29.60	0.00	0.00	0.00	0.00	0.00	0.00									

* Based on 2013 Peer Small Business Data -- US and PR

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

*** Source Data - Dun and Bradstreet (2013).

Table 8. Borrower Distribution of Home Purchase Loans

Borrower Distribution: HOME PURCHASE															Geography: HUNTINGTON MMSA					Evaluation Period: JANUARY 1, 2012 TO DECEMBER 31, 2013				
Assessment Area:	Total Home Purchase Loans		Low-Income Borrowers		Moderate-Income Borrowers		Middle-Income Borrowers		Upper-Income Borrowers		Market Share ¹													
	#	% of Total ^{**}	% Families ^{***}	% BANK Loans ^{****}	% Families ³	% BANK Loans ^{****}	% Families ^{***}	% BANK Loans ^{****}	% Families ^{***}	% BANK Loans ^{****}	Overall	Low	Mod	Mid	Upp									
Full Review:																								
Huntington-Ashland WV-KY-OH MSA 2013	47	100.00	20.91	11.63	17.58	20.93	19.63	37.21	41.87	30.23	1.55	3.37	1.36	1.69	1.36									

* Based on 2013 Peer Mortgage Data -- US and PR

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

*** Percentage of Families is based on the 2010 Census information.

**** As a percentage of loans with borrower income information available. No information was available for 8.5% of loans originated and purchased by bank.

³ Data shown includes only One to Four-family and manufactured housing. (Property type of 1 or 2)

Table 9. Borrower Distribution of Home Improvement Loans

Borrower Distribution: HOME IMPROVEMENT		Geography: HUNTINGTON MMSA					Evaluation Period: JANUARY 1, 2012 TO DECEMBER 31, 2013					Market Share*				
Assessment Area:	Total Home Improvement Loans		Low-Income Borrowers		Moderate-Income Borrowers		Middle-Income Borrowers		Upper-Income Borrowers		Overall	Low	Mod	Mid	Upp	
	#	% of Total**	% Families**	% BANK Loans****	% Families ⁴	% BANK Loans****	% Families***	% BANK Loans****	% Families***	% BANK Loans****						
Full Review:																
Huntington-Ashland WV-KY-OH MSA 2013	50	100.00	20.91	14.00	17.58	8.00	19.63	34.00	41.87	44.00	5.46	7.89	3.08	5.74	5.58	

* Based on 2013 Peer Mortgage Data -- US and PR

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

*** Percentage of Families is based on the 2010 Census information.

**** As a percentage of loans with borrower income information available. No information was available for 0.0% of loans originated and purchased by bank.

⁴ Data shown includes only One to Four-family and manufactured housing. (Property type of 1 or 2)

Table 10. Borrower Distribution of Home Mortgage Refinance Loans

Borrower Distribution: HOME MORTGAGE REFINANCE															
Geography: HUNTINGTON MMSA					Evaluation Period: JANUARY 1, 2012 TO DECEMBER 31, 2013										
Assessment Area:	Total Home Mortgage Refinance Loans		Low-Income Borrowers		Moderate-Income Borrowers		Middle-Income Borrowers		Upper-Income Borrowers		Market Share ¹				
	#	% of Total ^{**}	% Families ^{***}	% BANK Loans ^{****}	% Families ⁵	% BANK Loans ^{****}	% Families ^{***}	% BANK Loans ^{****}	% Families ^{***}	% BANK Loans ^{****}	Overall	Low	Mod	Mid	Upp
Full Review:															
Huntington-Ashland WV-KY-OH MSA 2013	121	100.00	20.91	8.40	17.58	21.01	19.63	25.21	41.87	45.38	2.27	2.42	3.22	2.43	1.97

* Based on 2013 Peer Mortgage Data -- US and PR

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

*** Percentage of Families is based on the 2010 Census information.

**** As a percentage of loans with borrower income information available. No information was available for 1.7% of loans originated and purchased by bank.

⁵ Data shown includes only One to Four-family and manufactured housing. (Property type of 1 or 2)

Table 11. Borrower Distribution of Small Loans to Businesses

Borrower Distribution: SMALL LOANS TO BUSINESSES									
Geography: HUNTINGTON MMSA					Evaluation Period: JANUARY 1, 2012 TO DECEMBER 31, 2013				
Assessment Area:	Total Small Loans to Businesses		Businesses With Revenues of \$1 million or less		Loans by Original Amount Regardless of Business Size			Market Share*	
	#	% of Total**	% of Businesses***	% BANK Loans****	\$100,000 or less	>\$100,000 to \$250,000	>\$250,000 to \$1,000,000	All	Rev\$ 1 Million or Less
Full Review:									
Huntington-Ashland WV-KY-OH MSA 2013	66	100.00	68.00	54.55	59.09	21.21	19.70	2.04	2.69

* Based on 2013 Peer Small Business Data -- US and PR

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

*** Businesses with revenues of \$1 million or less as a percentage of all businesses (Source D&B - 2013).

**** Small loans to businesses with revenues of \$1 million or less as a percentage of all loans reported as small loans to businesses. No information was available for 0.00% of small loans to businesses originated and purchased by the bank.

Table 12. Borrower Distribution of Small Loans to Farms

Borrower Distribution: SMALL LOANS TO FARMS		Geography: HUNTINGTON MMSA			Evaluation Period: JANUARY 1, 2012 TO DECEMBER 31, 2013				
Assessment Area:	Total Small Loans to Farms		Farms With Revenues of \$1 million or less		Loans by Original Amount Regardless of Farm Size			Market Share*	
	#	% of Total**	% of Farms***	% BANK Loans****	\$100,000 or less	>\$100,000 to \$250,000	>\$250,000 to \$500,000	All	Rev\$ 1 Million or Less
Full Review:									
Huntington-Ashland WV-KY-OH MSA 2013	0	0.00	98.13	0.00	0.00	0.00	0.00	0.00	0.00

* Based on 2013 Peer Small Business Data -- US and PR

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

*** Farms with revenues of \$1 million or less as a percentage of all farms (Source D&B - 2013).

**** Small loans to farms with revenues of \$1 million or less as a percentage of all loans reported as small loans to farms. No information was available for 0.00% of small loans to farms originated and purchased by the bank.

Table 14. Qualified Investments

QUALIFIED INVESTMENTS		Geography: HUNTINGTON MMSA		Evaluation Period: JANUARY 1, 2012 TO DECEMBER 31, 2013					
Assessment Area:	Prior Period Investments [*]		Current Period Investments		Total Investments			Unfunded Commitments ^{**}	
	#	\$(000's)	#	\$(000's)	#	\$(000's)	% of Total	#	\$(000's)
Full Review:									
Huntington-Ashland WV-KY-OH MSA 2013	0	0	3	410	3	410	100.00	0	0

* 'Prior Period Investments' means investments made in a previous period that are outstanding as of the examination date.

** 'Unfunded Commitments' means legally binding investment commitments that are tracked and recorded by the institution's financial reporting system.

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

DISTRIBUTION OF BRANCH DELIVERY SYSTEM AND BRANCH OPENINGS/CLOSINGS				Geography: HUNTINGTON MMSA				Evaluation Period: JANUARY 1, 2012 TO DECEMBER 31, 2013									
MA/Assessment Area:	Deposits	Branches				Branch Openings/Closings				Population							
	% of Rated Area Deposits in AA	# of BANK Branches	% of Rated Area Branches in AA	Location of Branches by Income of Geographies (%)				# of Branch Openings	# of Branch Closings	Net change in Location of Branches (+ or -)				% of Population within Each Geography			
				Low	Mod	Mid	Upp			Low	Mod	Mid	Upp	Low	Mod	Mid	Upp
Full Review:																	
Huntington-Ashland WV-KY-OH MSA 2013	100.00	6	100.00	1	2	2	1	0	0	0	0	0	0	5.31	16.31	51.15	27.23

Distribution of Branch and ATM Delivery System

Distribution of Branch and ATM Delivery System																	
Geography: HUNTINGTON MMSA																	
Evaluation Period: JANUARY 1, 2012 TO DECEMBER 31, 2013																	
MA/Assessment Area:	Deposits	Branches						ATMs						Population			
	% of Total Bank Deposits	# of Bank Branches	% of Total Bank Branches	Location of Branches by Income of Geographies (%)				#of Bank ATMs	% of Total Bank ATMs	Location of ATMs by Income of Geographies				% of Population within Each Geography			
				Low	Mod	Mid	Upp			Low	Mod	Mid	Upp	Low	Mod	Mid	Upp
Full Review:																	
Huntington-Ashland WV-KY-OH MSA 2013	100.00	6	100.00	1	2	2	1	5	100.00	1	1	2	1	5.31	16.31	51.15	27.23

Huntington-Ashland WV-KY-OH MSA 2013

Demographic Information for Full Scope Area: Huntington-Ashland WV-KY-OH MSA 2013						
Demographic Characteristics	#	Low % of #	Moderate % of #	Middle % of #	Upper % of #	NA* % of #
Geographies (Census Tracts/BNAs)	51	7.84	25.49	43.14	23.53	0.00
Population by Geography	182,771	5.31	16.31	51.15	27.23	0.00
Owner-Occupied Housing by Geography	51,050	1.61	12.42	54.64	31.33	0.00
Business by Geography	13,878	10.81	21.54	42.10	25.55	0.00
Farms by Geography	321	2.80	6.85	60.75	29.60	0.00
Family Distribution by Income Level	47,793	20.91	17.58	19.63	41.87	0.00
Distribution of Low and Moderate Income Families throughout AA Geographies	18,398	5.33	23.40	51.78	19.49	0.00
Median Family Income		48,544	Median Housing Value		92,866	
HUD Adjusted Median Family Income for 2013		50,800	Unemployment Rate (2010 US Census)		3.22%	
Households Below Poverty Level		19%				

(*) The NA category consists of geographies that have not been assigned an income classification.
 Source: 2010 US Census and 2013 HUD updated MFI

(1000005552) (Included)

Table 1. Lending Volume

LENDING VOLUME												
Geography: PARKERSBURG-MARIETTA												
Evaluation Period: JANUARY 1, 2012 TO DECEMBER 31, 2013												
Assessment Area (2013):	% of Rated Area Loans (#) in MA/AA*	Home Mortgage		Small Loans to Businesses		Small Loans to Farms		Community Development Loans**		Total Reported Loans		% of Rated Area Deposits in MA/AA***
		#	\$ (000's)	#	\$ (000's)	#	\$ (000's)	#	\$ (000's)	#	\$ (000's)	
Full Review:												
Parkersburg-MariettaMSA Washington-Wood Co 2012-13	100.00	1,255	141,284	235	26,971	0	0	3	9,313	1,490	168,255	0.00

* Loan Data as of December 31, 2013. Rated area refers to either state or multi-state MA rating area.

** The evaluation period for Community Development Loans is from January 01, 2013 to December 31, 2013.

*** Deposit Data as of June 17, 2015. Rated Area refers to either the state, multi-state MA, or institution, as appropriate.

(1000005552) (Included)

Table 1. Other Products

LENDING VOLUME		Geography: PARKERSBURG-MARIETTA						Evaluation Period: JANUARY 1, 2012 TO DECEMBER 31, 2013						
Assessment Area (2013):	% of Rated Area Loans (#) in MA/AA*	Total Optional Loans**		Small Business Real Estate Secured**		Home Equity**		Motor Vehicle**		Credit Card**		Other Secured Consumer**		% of Rated Area Deposits in AA***
		#	\$ (000's)	#	\$ (000's)	#	\$ (000's)	#	\$ (000's)	#	\$ (000's)	#	\$(000's)	
Full Review:														
Parkersburg-MariettaMSA Washington-Wood Co 2012-13	0.00	0	0	0	0	0	0	0	0	0	0	0	0	0.00

* Loan Data as of December 31, 2013. Rated area refers to either state or multi-state MA rating area.
 ** The evaluation period for Optional Product Line(s) is from January 01, 2012 to December 31, 2013.
 *** Deposit Data as of June 17, 2015. Rated Area refers to either the state, multi-state MA, or institution, as appropriate.

(1000005552) (Included)

Table 1. Other Products

LENDING VOLUME		Geography: PARKERSBURG-MARIETTA		Evaluation Period: JANUARY 1, 2012 TO DECEMBER 31, 2013	
Assessment Area (2013):	Other Unsecured Consumer Loans*		Other Optional Loans*		Full Review:
	#	\$ (000's)	#	\$ (000's)	
Parkersburg-MariettaMSA Washington-Wood Co 2012-13	0	0	0	0	0

* The evaluation period for Optional Product Line(s) is from January 01, 2012 to December 31, 2013.

Table 2. Geographic Distribution of Home Purchase Loans

Geographic Distribution: HOME PURCHASE		Geography: PARKERSBURG-MARIETTA				Evaluation Period: JANUARY 1, 2012 TO DECEMBER 31, 2013									
Assessment Area:	Total Home Purchase Loans		Low-Income Geographies		Moderate-Income Geographies		Middle-Income Geographies		Upper-Income Geographies		Market Share (%) by Geography*				
	#	% of Total**	% Owner Occ Units***	% BANK Loans****	% Owner Occ Units***	% BANK Loans	% Owner Occ Units***	% BANK Loans	% Owner Occ Units***	% BANK Loans	Over all	Low	Mod	Mid	Upp
Full Review:															
Parkersburg-MariettaMSA Washington-Wood Co 2012-13	334	100.00	0.00	0.00	13.45	14.97	69.85	60.48	16.70	24.55	11.74	0.00	11.27	11.50	12.82

* Based on 2013 Peer Mortgage Data -- US and PR

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

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

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

Table 3. Geographic Distribution of Home Improvement Loans

Geographic Distribution: HOME IMPROVEMENT		Geography: PARKERSBURG-MARIETTA				Evaluation Period: JANUARY 1, 2012 TO DECEMBER 31, 2013					Market Share (%) by Geography*				
Assessment Area:	Total Home Improvement Loans		Low-Income Geographies		Moderate-Income Geographies		Middle-Income Geographies		Upper-Income Geographies		Overall	Low	Mod	Mid	Upp
	#	% of Total**	% Owner Occ Units***	% BANK Loans****	% Owner Occ Units***	% BANK Loans	% Owner Occ Units***	% BANK Loans	% Owner Occ Units***	% BANK Loans					
Full Review:															
Parkersburg-MariettaMSA Washington-Wood Co 2012-13	92	100.00	0.00	0.00	13.45	8.70	69.85	67.39	16.70	23.91	18.79	0.00	9.30	17.51	28.57

* Based on 2013 Peer Mortgage Data -- US and PR

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

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

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

Table 4. Geographic Distribution of Home Mortgage Refinance Loans

Geographic Distribution: HOME MORTGAGE REFINANCE			Geography: PARKERSBURG-MARIETTA				Evaluation Period: JANUARY 1, 2012 TO DECEMBER 31, 2013					Market Share (%) by Geography*				
Assessment Area:	Total Home Mortgage Refinance Loans		Low-Income Geographies		Moderate-Income Geographies		Middle-Income Geographies		Upper-Income Geographies		Overall	Low	Mod	Mid	Upp	
	#	% of Total**	% Owner Occ Units***	% BANK Loans****	% Owner Occ Units***	% BANK Loans	% Owner Occ Units***	% BANK Loans	% Owner Occ Units***	% BANK Loans						
Full Review:																
Parkersburg-MariettaMSA Washington-Wood Co 2012-13	827	100.00	0.00	0.00	13.45	10.52	69.85	68.56	16.70	20.92	16.65	0.00	16.30	16.56	17.15	

* Based on 2013 Peer Mortgage Data -- US and PR

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

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

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

Table 5. Geographic Distribution of Multifamily Loans

Geographic Distribution: MULTIFAMILY		Geography: PARKERSBURG-MARIETTA					Evaluation Period: JANUARY 1, 2012 TO DECEMBER 31, 2013									
Assessment Area:	Total Multifamily Loans		Low-Income Geographies		Moderate-Income Geographies		Middle-Income Geographies		Upper-Income Geographies		Market Share (%) by Geography*					
	#	% of Total**	% of MF Units***	% BANK Loans****	% MF Units***	% BANK Loans	% MF Units***	% BANK Loans	% MF Units***	% BANK Loans	Overall	Low	Mod	Mid	Upp	
Full Review:																
Parkersburg-MariettaMSA Washington-Wood Co 2012-13	2	100.00	0.00	0.00	34.57	50.00	54.88	50.00	10.55	0.00	4.55	0.00	14.29	0.00	0.00	

* Based on 2013 Peer Mortgage Data -- US and PR

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

*** Percentage of Multi Family Units is the number of multi family units in a particular geography divided by the number of multifamily housing units in the area based on 2010 Census information.

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

Table 6. Geographic Distribution of Small Loans to Businesses

Geographic Distribution: SMALL LOANS TO BUSINESSES															Geography: PARKERSBURG-MARIETTA					Evaluation Period: JANUARY 1, 2012 TO DECEMBER 31, 2013				
Assessment Area:	Total Small Business Loans		Low-Income Geographies		Moderate-Income Geographies		Middle-Income Geographies		Upper-Income Geographies		Market Share (%) by Geography*													
	#	% of Total**	% of Business S***	% BANK Loans	% of Business S***	% BANK Loans	% of Business S***	% BANK Loans	% of Business S***	% BANK Loans	Overall	Low	Mod	Mid	Upp									
Full Review:																								
Parkersburg-MariettaMSA Washington-Wood Co 2012-13	235	100.00	0.00	0.00	26.01	29.36	60.17	62.13	13.82	8.51	7.44	0.00	7.61	8.34	4.97									

* Based on 2013 Peer Small Business Data -- US and PR

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

*** Source Data - Dun and Bradstreet (2013).

Table 7. Geographic Distribution of Small Loans to Farms

Geographic Distribution: SMALL LOANS TO FARMS															Geography: PARKERSBURG-MARIETTA					Evaluation Period: JANUARY 1, 2012 TO DECEMBER 31, 2013										
Assessment Area:	Total Small Farm Loans		Low-Income Geographies		Moderate-Income Geographies		Middle-Income Geographies		Upper-Income Geographies		Market Share (%) by Geography*																			
	#	% of Total**	% of Farms***	% BANK Loans	% of Farms***	% BANK Loans	% of Farms***	% BANK Loans	% of Farms***	% BANK Loans	Overall	Low	Mod	Mid	Upp															
Full Review:																														
Parkersburg-MariettaMSA Washington-Wood Co 2012-13	0	0.00	0.00	0.00	9.85	0.00	78.57	0.00	11.58	0.00	0.00	0.00	0.00	0.00	0.00															

* Based on 2013 Peer Small Business Data -- US and PR

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

*** Source Data - Dun and Bradstreet (2013).

Table 8. Borrower Distribution of Home Purchase Loans

Borrower Distribution: HOME PURCHASE															
Geography: PARKERSBURG-MARIETTA															
Evaluation Period: JANUARY 1, 2012 TO DECEMBER 31, 2013															
Assessment Area:	Total Home Purchase Loans		Low-Income Borrowers		Moderate-Income Borrowers		Middle-Income Borrowers		Upper-Income Borrowers		Market Share*				
	#	% of Total**	% Families***	% BANK Loans****	% Families 6	% BANK Loans****	% Families***	% BANK Loans****	% Families***	% BANK Loans****	Overall	Low	Mod	Mid	Upp
Full Review:															
Parkersburg-MariettaMSA Washington-Wood Co 2012-13	334	100.00	20.36	10.83	17.53	25.16	22.42	22.93	39.70	41.08	12.32	16.00	11.68	12.86	11.28

* Based on 2013 Peer Mortgage Data -- US and PR

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

*** Percentage of Families is based on the 2010 Census information.

**** As a percentage of loans with borrower income information available. No information was available for 6.0% of loans originated and purchased by bank.

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

Table 9. Borrower Distribution of Home Improvement Loans

Borrower Distribution: HOME IMPROVEMENT		Geography: PARKERSBURG-MARIETTA					Evaluation Period: JANUARY 1, 2012 TO DECEMBER 31, 2013					Market Share*				
Assessment Area:	Total Home Improvement Loans		Low-Income Borrowers		Moderate-Income Borrowers		Middle-Income Borrowers		Upper-Income Borrowers		Overall	Low	Mod	Mid	Upp	
	#	% of Total**	% Families*	% BANK Loans***	% Families ⁷	% BANK Loans****	% Families***	% BANK Loans****	% Families***	% BANK Loans****						
Full Review:																
Parkersburg-MariettaMSA Washington-Wood Co 2012-13	92	100.00	20.36	5.56	17.53	22.22	22.42	32.22	39.70	40.00	19.17	9.09	20.90	28.95	15.87	

* Based on 2013 Peer Mortgage Data -- US and PR

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

*** Percentage of Families is based on the 2010 Census information.

**** As a percentage of loans with borrower income information available. No information was available for 2.2% of loans originated and purchased by bank.

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

Table 10. Borrower Distribution of Home Mortgage Refinance Loans

Borrower Distribution: HOME MORTGAGE REFINANCE		Geography: PARKERSBURG-MARIETTA					Evaluation Period: JANUARY 1, 2012 TO DECEMBER 31, 2013					Market Share*				
Assessment Area:	Total Home Mortgage Refinance Loans		Low-Income Borrowers		Moderate-Income Borrowers		Middle-Income Borrowers		Upper-Income Borrowers		Market Share*					
	#	% of Total**	% Families**	% BANK Loans****	% Families ⁸	% BANK Loans****	% Families***	% BANK Loans****	% Families***	% BANK Loans****	Overall	Low	Mod	Mid	Upp	
Full Review:																
Parkersburg-MariettaMSA Washington-Wood Co 2012-13	827	100.00	20.36	4.62	17.53	20.00	22.42	26.15	39.70	49.23	18.13	17.04	20.82	20.56	15.66	

* Based on 2013 Peer Mortgage Data -- US and PR

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

*** Percentage of Families is based on the 2010 Census information.

**** As a percentage of loans with borrower income information available. No information was available for 5.7% of loans originated and purchased by bank.

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

Table 11. Borrower Distribution of Small Loans to Businesses

Borrower Distribution: SMALL LOANS TO BUSINESSES		Geography: PARKERSBURG-MARIETTA			Evaluation Period: JANUARY 1, 2012 TO DECEMBER 31, 2013				
Assessment Area:	Total Small Loans to Businesses		Businesses With Revenues of \$1 million or less		Loans by Original Amount Regardless of Business Size			Market Share*	
	#	% of Total**	% of Businesses***	% BANK Loans****	\$100,000 or less	>\$100,000 to \$250,000	>\$250,000 to \$1,000,000	All	Rev\$ 1 Million or Less
Full Review:									
Parkersburg-MariettaMSA Washington-Wood Co 2012-13	235	100.00	65.17	74.47	70.64	15.74	13.62	7.44	15.78

* Based on 2013 Peer Small Business Data -- US and PR

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

*** Businesses with revenues of \$1 million or less as a percentage of all businesses (Source D&B - 2013).

**** 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 1.70% of small loans to businesses originated and purchased by the bank.

Table 12. Borrower Distribution of Small Loans to Farms

Borrower Distribution: SMALL LOANS TO FARMS		Geography: PARKERSBURG-MARIETTA			Evaluation Period: JANUARY 1, 2012 TO DECEMBER 31, 2013				
Assessment Area:	Total Small Loans to Farms		Farms With Revenues of \$1 million or less		Loans by Original Amount Regardless of Farm Size			Market Share*	
	#	% of Total**	% of Farms***	% BANK Loans****	\$100,000 or less	>\$100,000 to \$250,000	>\$250,000 to \$500,000	All	Rev\$ 1 Million or Less
Full Review:									
Parkersburg-MariettaMSA Washington-Wood Co 2012-13	0	0.00	98.65	0.00	0.00	0.00	0.00	0.00	0.00

* Based on 2013 Peer Small Business Data -- US and PR

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

*** Farms with revenues of \$1 million or less as a percentage of all farms (Source D&B - 2013).

**** Small loans to farms with revenues of \$1 million or less as a percentage of all loans reported as small loans to farms. No information was available for 0.00% of small loans to farms originated and purchased by the bank.

Table 14. Qualified Investments

QUALIFIED INVESTMENTS									
Geography: PARKERSBURG-MARIETTA				Evaluation Period: JANUARY 1, 2012 TO DECEMBER 31, 2013					
Assessment Area:	Prior Period Investments*		Current Period Investments		Total Investments			Unfunded Commitments**	
	#	\$(000's)	#	\$(000's)	#	\$(000's)	% of Total	#	\$(000's)
Full Review:									
Parkersburg-MariettaMSA Washington-Wood Co 2012-13	1	470	5	1,992	6	2,462	100.00	0	0

* 'Prior Period Investments' means investments made in a previous period that are outstanding as of the examination date.

** 'Unfunded Commitments' means legally binding investment commitments that are tracked and recorded by the institution's financial reporting system.

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

DISTRIBUTION OF BRANCH DELIVERY SYSTEM AND BRANCH OPENINGS/CLOSINGS				Geography: PARKERSBURG-MARIETTA				Evaluation Period: JANUARY 1, 2012 TO DECEMBER 31, 2013									
MA/Assessment Area:	Deposits	Branches				Branch Openings/Closings				Population							
	% of Rated Area Deposits in AA	# of BANK Branches	Location of Branches by Income of Geographies (%)				# of Branch Openings	# of Branch Closings	Net change in Location of Branches (+ or -)				% of Population within Each Geography				
			Low	Mod	Mid	Upp			Low	Mod	Mid	Upp	Low	Mod	Mid	Upp	
Full Review:																	
Parkersburg-MariettaMSA Washington-Wood Co 2012-13	100.00	6	100.00	1	2	2	1	2	0	0	0	2	0	0.00	17.53	67.56	14.91

Distribution of Branch and ATM Delivery System

Distribution of Branch and ATM Delivery System		Geography: PARKERSBURG-MARIETTA						Evaluation Period: JANUARY 1, 2012 TO DECEMBER 31, 2013									
MA/Assessment Area:	Deposits	Branches						ATMs				Population					
	% of Total Bank Deposits	# of Bank Branches	% of Total Bank Branches	Location of Branches by Income of Geographies (%)				#of Bank ATMs	% of Total Bank ATMs	Location of ATMs by Income of Geographies				% of Population within Each Geography			
				Low	Mod	Mid	Upp			Low	Mod	Mid	Upp	Low	Mod	Mid	Upp
Full Review:																	
Parkersburg-MariettaMSA Washington-Wood Co 2012-13	100.00	6	100.00	1	2	2	1	14	100.00	0	5	9	0	0.00	17.53	67.56	14.91

Institution ID: PEOPLES BANK, NATIONAL ASSOCIA (10000005552) (Included)

Parkersburg-MariettaMSA Washington-Wood Co 2012-13

Demographic Information for Full Scope Area: Parkersburg-MariettaMSA Washington-Wood Co 2012-13						
Demographic Characteristics	#	Low % of #	Moderate % of #	Middle % of #	Upper % of #	NA* % of #
Geographies (Census Tracts/BNAs)	42	0.00	21.43	64.29	14.29	0.00
Population by Geography	148,734	0.00	17.53	67.56	14.91	0.00
Owner-Occupied Housing by Geography	45,520	0.00	13.45	69.85	16.70	0.00
Business by Geography	12,374	0.00	26.01	60.17	13.82	0.00
Farms by Geography	518	0.00	9.85	78.57	11.58	0.00
Family Distribution by Income Level	40,957	20.36	17.53	22.42	39.70	0.00
Distribution of Low and Moderate Income Families throughout AA Geographies	15,516	0.00	22.38	66.28	11.34	0.00
Median Family Income		52,293	Median Housing Value		105,992	
HUD Adjusted Median Family Income for 2013		57,400	Unemployment Rate (2010 US Census)		3.78%	
Households Below Poverty Level		15%				

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

Source: 2010 US Census and 2013 HUD updated MFI

Table 1. Lending Volume

LENDING VOLUME		Geography: WV				Evaluation Period: JANUARY 1, 2012 TO DECEMBER 31, 2013						
Assessment Area (2013):	% of Rated Area Loans (#) in MA/AA*	Home Mortgage		Small Loans to Businesses		Small Loans to Farms		Community Development Loans**		Total Reported Loans		% of Rated Area Deposits in MA/AA***
		#	\$ (000's)	#	\$ (000's)	#	\$ (000's)	#	\$ (000's)	#	\$ (000's)	
Full Review:												
WV NonMSA 2013	100.00	130	10,470	11	1,097	0	0	2	90	141	11,567	0.00

* Loan Data as of December 31, 2013. Rated area refers to either state or multi-state MA rating area.

** The evaluation period for Community Development Loans is from January 01, 2013 to December 31, 2013.

*** Deposit Data as of January 15, 2015. Rated Area refers to either the state, multi-state MA, or institution, as appropriate.

Table 1. Other Products

LENDING VOLUME		Geography: WV				Evaluation Period: JANUARY 1, 2012 TO DECEMBER 31, 2013								
Assessment Area (2013):	% of Rated Area Loans (#) in MA/AA*	Total Optional Loans**		Small Business Real Estate Secured**		Home Equity**		Motor Vehicle**		Credit Card**		Other Secured Consumer**		% of Rated Area Deposits in AA***
		#	\$ (000's)	#	\$ (000's)	#	\$ (000's)	#	\$ (000's)	#	\$ (000's)	#	\$ (000's)	
Full Review:														
WV NonMSA 2013	0.00	0	0	0	0	0	0	0	0	0	0	0	0	0.00

* Loan Data as of December 31, 2013. Rated area refers to either state or multi-state MA rating area.

** The evaluation period for Optional Product Line(s) is from January 01, 2012 to December 31, 2013.

*** Deposit Data as of January 15, 2015. Rated Area refers to either the state, multi-state MA, or institution, as appropriate.

Table 1. Other Products

LENDING VOLUME		Geography: WV		Evaluation Period: JANUARY 1, 2012 TO DECEMBER 31, 2013	
Assessment Area (2013):	Other Unsecured Consumer Loans*		Other Optional Loans*		
	#	\$ (000's)	#	\$ (000's)	
Full Review:					
WV NonMSA 2013	0	0	0	0	

* The evaluation period for Optional Product Line(s) is from January 01, 2012 to December 31, 2013.

Table 2. Geographic Distribution of Home Purchase Loans

Geographic Distribution: HOME PURCHASE															Geography: WV					Evaluation Period: JANUARY 1, 2012 TO DECEMBER 31, 2013				
Assessment Area:	Total Home Purchase Loans		Low-Income Geographies		Moderate-Income Geographies		Middle-Income Geographies		Upper-Income Geographies		Market Share (%) by Geography ¹													
	#	% of Total ^{**}	% Owner Occ Units ^{***}	% BANK Loans ^{****}	% Owner Occ Units ^{***}	% BANK Loans	% Owner Occ Units ^{***}	% BANK Loans	% Owner Occ Units ^{***}	% BANK Loans	Over all	Low	Mod	Mid	Upp									
Full Review:																								
WV NonMSA 2013	32	100.00	0.00	0.00	5.12	0.00	84.08	65.63	10.80	34.38	4.22	0.00	0.00	3.28	9.26									

* Based on 2013 Peer Mortgage Data -- US and PR

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

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

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

Table 3. Geographic Distribution of Home Improvement Loans

Geographic Distribution: HOME IMPROVEMENT															Geography: WV					Evaluation Period: JANUARY 1, 2012 TO DECEMBER 31, 2013				
Assessment Area:	Total Home Improvement Loans		Low-Income Geographies		Moderate-Income Geographies		Middle-Income Geographies		Upper-Income Geographies		Market Share (%) by Geography*													
	#	% of Total**	% Owner Occ Units***	% BANK Loans****	% Owner Occ Units***	% BANK Loans	% Owner Occ Units***	% BANK Loans	% Owner Occ Units***	% BANK Loans	Overall	Low	Mod	Mid	Upp									
Full Review:																								
WV NonMSA 2013	16	100.00	0.00	0.00	5.12	0.00	84.08	75.00	10.80	25.00	11.21	0.00	0.00	9.28	36.36									

* Based on 2013 Peer Mortgage Data -- US and PR

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

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

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

Table 4. Geographic Distribution of Home Mortgage Refinance Loans

Geographic Distribution: HOME MORTGAGE REFINANCE															Geography: WV					Evaluation Period: JANUARY 1, 2012 TO DECEMBER 31, 2013				
Assessment Area:	Total Home Mortgage Refinance Loans		Low-Income Geographies		Moderate-Income Geographies		Middle-Income Geographies		Upper-Income Geographies		Market Share (%) by Geography													
	#	% of Total**	% Owner Occ Units***	% BANK Loans****	% Owner Occ Units***	% BANK Loans	% Owner Occ Units***	% BANK Loans	% Owner Occ Units***	% BANK Loans	Overall	Low	Mod	Mid	Upp									
Full Review:																								
WV NonMSA 2013	82	100.00	0.00	0.00	5.12	6.10	84.08	84.15	10.80	9.76	13.49	0.00	18.18	13.69	10.81									

* Based on 2013 Peer Mortgage Data -- US and PR

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

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

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

Table 5. Geographic Distribution of Multifamily Loans

Geographic Distribution: MULTIFAMILY															
Geography: WV															
Evaluation Period: JANUARY 1, 2012 TO DECEMBER 31, 2013															
Assessment Area:	Total Multifamily Loans		Low-Income Geographies		Moderate-Income Geographies		Middle-Income Geographies		Upper-Income Geographies		Market Share (%) by Geography				
	#	% of Total**	% of MF Units***	% BANK Loans****	% MF Units***	% BANK Loans	% MF Units***	% BANK Loans	% MF Units***	% BANK Loans	Overall	Low	Mod	Mid	Upp
Full Review:															
WV NonMSA 2013	0	0.00	0.00	0.00	0.41	0.00	80.49	0.00	19.10	0.00	0.00	0.00	0.00	0.00	0.00

* Based on 2013 Peer Mortgage Data -- US and PR

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

*** Percentage of Multi Family Units is the number of multi family units in a particular geography divided by the number of multifamily housing units in the area based on 2010 Census information.

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

Table 6. Geographic Distribution of Small Loans to Businesses

Geographic Distribution: SMALL LOANS TO BUSINESSES															Geography: WV		Evaluation Period: JANUARY 1, 2012 TO DECEMBER 31, 2013												
Assessment Area:	Total Small Business Loans		Low-Income Geographies		Moderate-Income Geographies		Middle-Income Geographies		Upper-Income Geographies		Market Share (%) by Geography*																		
	#	% of Total**	% of Businesses***	% BANK Loans	% of Businesses***	% BANK Loans	% of Businesses***	% BANK Loans	% of Businesses***	% BANK Loans	Overall	Low	Mod	Mid	Upp														
Full Review:																													
WV NonMSA 2013	11	100.00	0.00	0.00	3.45	0.00	76.21	45.45	20.34	54.55	2.60	0.00	0.00	0.65	11.11														

* Based on 2013 Peer Small Business Data -- US and PR

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

*** Source Data - Dun and Bradstreet (2013).

Table 7. Geographic Distribution of Small Loans to Farms

Geographic Distribution: SMALL LOANS TO FARMS															
Geography: WV					Evaluation Period: JANUARY 1, 2012 TO DECEMBER 31, 2013										
Assessment Area:	Total Small Farm Loans		Low-Income Geographies		Moderate-Income Geographies		Middle-Income Geographies		Upper-Income Geographies		Market Share (%) by Geography*				
	#	% of Total**	% of Farms***	% BANK Loans	% of Farms***	% BANK Loans	% of Farms***	% BANK Loans	% of Farms***	% BANK Loans	Overall	Low	Mod	Mid	Upp
Full Review:															
WV NonMSA 2013	0	0.00	0.00	0.00	7.88	0.00	84.85	0.00	7.27	0.00	0.00	0.00	0.00	0.00	0.00

* Based on 2013 Peer Small Business Data -- US and PR

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

*** Source Data - Dun and Bradstreet (2013).

Table 8. Borrower Distribution of Home Purchase Loans

Borrower Distribution: HOME PURCHASE															Geography: WV					Evaluation Period: JANUARY 1, 2012 TO DECEMBER 31, 2013				
Assessment Area:	Total Home Purchase Loans		Low-Income Borrowers		Moderate-Income Borrowers		Middle-Income Borrowers		Upper-Income Borrowers		Market Share ⁹													
	#	% of Total ^{**}	% Families ^{***}	% BANK Loans ^{****}	% Families ⁹	% BANK Loans ^{****}	% Families ^{***}	% BANK Loans ^{****}	% Families ^{***}	% BANK Loans ^{****}	Overall	Low	Mod	Mid	Upp									
Full Review:																								
WV NonMSA 2013	32	100.00	20.01	3.23	17.75	32.26	20.40	22.58	41.84	41.94	4.27	0.00	2.63	4.65	4.83									

* Based on 2013 Peer Mortgage Data -- US and PR

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

*** Percentage of Families is based on the 2010 Census information.

**** As a percentage of loans with borrower income information available. No information was available for 3.1% of loans originated and purchased by bank.

⁹ Data shown includes only One to Four-family and manufactured housing. (Property type of 1 or 2)

Table 9. Borrower Distribution of Home Improvement Loans

Borrower Distribution: HOME IMPROVEMENT															Geography: WV					Evaluation Period: JANUARY 1, 2012 TO DECEMBER 31, 2013				
Assessment Area:	Total Home Improvement Loans		Low-Income Borrowers		Moderate-Income Borrowers		Middle-Income Borrowers		Upper-Income Borrowers		Market Share ¹⁰													
	#	% of Total**	% Families**	% BANK Loans****	% Families ¹⁰	% BANK Loans****	% Families***	% BANK Loans****	% Families***	% BANK Loans****	Overall	Low	Mod	Mid	Upp									
Full Review:																								
WV NonMSA 2013	16	100.00	20.01	0.00	17.75	12.50	20.40	50.00	41.84	37.50	11.61	0.00	11.76	26.09	8.47									

* Based on 2013 Peer Mortgage Data -- US and PR

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

*** Percentage of Families is based on the 2010 Census information.

**** As a percentage of loans with borrower income information available. No information was available for 0.0% of loans originated and purchased by bank.

¹⁰ Data shown includes only One to Four-family and manufactured housing. (Property type of 1 or 2)

Table 10. Borrower Distribution of Home Mortgage Refinance Loans

Borrower Distribution: HOME MORTGAGE REFINANCE															
Geography: WV					Evaluation Period: JANUARY 1, 2012 TO DECEMBER 31, 2013										
Assessment Area:	Total Home Mortgage Refinance Loans		Low-Income Borrowers		Moderate-Income Borrowers		Middle-Income Borrowers		Upper-Income Borrowers		Market Share ¹				
	#	% of Total ^{**}	% Families ^{***}	% BANK Loans ^{****}	% Families ¹¹	% BANK Loans ^{****}	% Families ^{***}	% BANK Loans ^{****}	% Families ^{***}	% BANK Loans ^{****}	Overall	Low	Mod	Mid	Upp
Full Review:															
WV NonMSA 2013	82	100.00	20.01	8.64	17.75	13.58	20.40	23.46	41.84	54.32	15.06	10.00	23.53	17.39	12.33

* Based on 2013 Peer Mortgage Data -- US and PR

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

*** Percentage of Families is based on the 2010 Census information.

**** As a percentage of loans with borrower income information available. No information was available for 1.2% of loans originated and purchased by bank.

¹¹ Data shown includes only One to Four-family and manufactured housing. (Property type of 1 or 2)

Table 11. Borrower Distribution of Small Loans to Businesses

Borrower Distribution: SMALL LOANS TO BUSINESSES									
Geography: WV					Evaluation Period: JANUARY 1, 2012 TO DECEMBER 31, 2013				
Assessment Area:	Total Small Loans to Businesses		Businesses With Revenues of \$1 million or less		Loans by Original Amount Regardless of Business Size			Market Share*	
	#	% of Total**	% of Businesses***	% BANK Loans****	\$100,000 or less	>\$100,000 to \$250,000	>\$250,000 to \$1,000,000	All	Rev\$ 1 Million or Less
Full Review:									
WV NonMSA 2013	11	100.00	59.46	90.91	81.82	9.09	9.09	2.60	6.12

* Based on 2013 Peer Small Business Data -- US and PR

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

*** Businesses with revenues of \$1 million or less as a percentage of all businesses (Source D&B - 2013).

**** Small loans to businesses with revenues of \$1 million or less as a percentage of all loans reported as small loans to businesses. No information was available for 0.00% of small loans to businesses originated and purchased by the bank.

Table 12. Borrower Distribution of Small Loans to Farms

Borrower Distribution: SMALL LOANS TO FARMS		Geography: WV			Evaluation Period: JANUARY 1, 2012 TO DECEMBER 31, 2013				
Assessment Area:	Total Small Loans to Farms		Farms With Revenues of \$1 million or less		Loans by Original Amount Regardless of Farm Size			Market Share*	
	#	% of Total**	% of Farms***	% BANK Loans****	\$100,000 or less	>\$100,000 to \$250,000	>\$250,000 to \$500,000	All	Rev\$ 1 Million or Less
Full Review:									
WV NonMSA 2013	0	0.00	100.00	0.00	0.00	0.00	0.00	0.00	0.00

* Based on 2013 Peer Small Business Data -- US and PR

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

*** Farms with revenues of \$1 million or less as a percentage of all farms (Source D&B - 2013).

**** Small loans to farms with revenues of \$1 million or less as a percentage of all loans reported as small loans to farms. No information was available for 0.00% of small loans to farms originated and purchased by the bank.

Table 14. Qualified Investments

QUALIFIED INVESTMENTS									
			Geography: WV		Evaluation Period: JANUARY 1, 2012 TO DECEMBER 31, 2013				
Assessment Area:	Prior Period Investments [*]		Current Period Investments		Total Investments			Unfunded Commitments ^{**}	
	#	\$(000's)	#	\$(000's)	#	\$(000's)	% of Total	#	\$(000's)
Full Review:									
WV NonMSA 2013	0	0	4	394	4	394	100.00	0	0

* 'Prior Period Investments' means investments made in a previous period that are outstanding as of the examination date.

** 'Unfunded Commitments' means legally binding investment commitments that are tracked and recorded by the institution's financial reporting system.

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

DISTRIBUTION OF BRANCH DELIVERY SYSTEM AND BRANCH OPENINGS/CLOSINGS																Geography: WV				Evaluation Period: JANUARY 1, 2012 TO DECEMBER 31, 2013			
MA/Assessment Area:	Deposits	Branches						Branch Openings/Closings						Population									
	% of Rated Area Deposits in AA	# of BANK Branches	% of Rated Area Branches in AA	Location of Branches by Income of Geographies (%)				# of Branch Openings	# of Branch Closings	Net change in Location of Branches (+ or -)				% of Population within Each Geography									
				Low	Mod	Mid	Upp			Low	Mod	Mid	Upp	Low	Mod	Mid	Upp						
Full Review:																							
WV NonMSA 2013	0.00	5	100.00	0.00	3	2	0.00	1	1	0	0	0	0	0.00	5.26	83.23	11.51						

Distribution of Branch and ATM Delivery System

Distribution of Branch and ATM Delivery System		Geography: WV						Evaluation Period: JANUARY 1, 2012 TO DECEMBER 31, 2013									
MA/Assessment Area:	Deposits	Branches						ATMs				Population					
	% of Total Bank Deposits	# of Bank Branches	% of Total Bank Branches	Location of Branches by Income of Geographies (%)				#of Bank ATMs	% of Total Bank ATMs	Location of ATMs by Income of Geographies				% of Population within Each Geography			
				Low	Mod	Mid	Upp			Low	Mod	Mid	Upp	Low	Mod	Mid	Upp
Full Review:																	
WV NonMSA 2013	100.00	5	100.00	0	0	3	2	3	0.00	0	1	0	2	0.00	5.26	83.23	11.51

Institution ID: PEOPLES BANK, NATIONAL ASSOCIA (10000005552) (Included)

WV NonMSA 2013

Demographic Information for Full Scope Area: WV NonMSA 2013						
Demographic Characteristics	#	Low % of #	Moderate % of #	Middle % of #	Upper % of #	NA* % of #
Geographies (Census Tracts/BNAs)	14	0.00	7.14	78.57	14.29	0.00
Population by Geography	53,115	0.00	5.26	83.23	11.51	0.00
Owner-Occupied Housing by Geography	17,191	0.00	5.12	84.08	10.80	0.00
Business by Geography	2,871	0.00	3.45	76.21	20.34	0.00
Farms by Geography	165	0.00	7.88	84.85	7.27	0.00
Family Distribution by Income Level	14,904	20.01	17.75	20.40	41.84	0.00
Distribution of Low and Moderate Income Families throughout AA Geographies	5,627	0.00	7.80	84.81	7.39	0.00
Median Family Income		43,801	Median Housing Value		80,628	
HUD Adjusted Median Family Income for 2013		46,100	Unemployment Rate (2010 US Census)		3.80%	
Households Below Poverty Level		18%				

(*) The NA category consists of geographies that have not been assigned an income classification.
Source: 2010 US Census and 2013 HUD updated MFI

Table 1. Lending Volume

LENDING VOLUME		Geography: STATE OF OH 2012-2013				Evaluation Period: JANUARY 1, 2012 TO DECEMBER 31, 2013						
Assessment Area (2013):	% of Rated Area Loans (#) in MA/AA*	Home Mortgage		Small Loans to Businesses		Small Loans to Farms		Community Development Loans**		Total Reported Loans		% of Rated Area Deposits in MA/AA***
		#	\$ (000's)	#	\$ (000's)	#	\$ (000's)	#	\$ (000's)	#	\$ (000's)	
Full Review:												
Columbus MSA Fairfield Co 2012-2013	10.95	80	10,144	54	5,986	0	0	5	1,756	134	16,130	10.30
OH NonMSA 2012-13	89.05	886	90,686	202	18,998	2	54	15	8,031	1,090	109,738	89.70

* Loan Data as of December 31, 2013. Rated area refers to either state or multi-state MA rating area.

** The evaluation period for Community Development Loans is from January 01, 2013 to December 31, 2013.

*** Deposit Data as of June 17, 2015. Rated Area refers to either the state, multi-state MA, or institution, as appropriate.

Table 1. Other Products

LENDING VOLUME		Geography: STATE OF OH 2012-2013				Evaluation Period: JANUARY 1, 2012 TO DECEMBER 31, 2013								
Assessment Area (2013):	% of Rated Area Loans (#) in MA/AA*	Total Optional Loans**		Small Business Real Estate Secured**		Home Equity**		Motor Vehicle**		Credit Card**		Other Secured Consumer**		% of Rated Area Deposits in AA***
		#	\$ (000's)	#	\$ (000's)	#	\$ (000's)	#	\$ (000's)	#	\$ (000's)	#	\$ (000's)	
Full Review:														
Columbus MSA Fairfield Co 2012-2013	0.00	0	0	0	0	0	0	0	0	0	0	0	0	0.00
OH NonMSA 2012-13	0.00	0	0	0	0	0	0	0	0	0	0	0	0	0.00

* Loan Data as of December 31, 2013. Rated area refers to either state or multi-state MA rating area.

** The evaluation period for Optional Product Line(s) is from January 01, 2012 to December 31, 2013.

*** Deposit Data as of June 17, 2015. Rated Area refers to either the state, multi-state MA, or institution, as appropriate.

Table 1. Other Products

LENDING VOLUME		Geography: STATE OF OH 2012-2013		Evaluation Period: JANUARY 1, 2012 TO DECEMBER 31, 2013	
Assessment Area (2013):	Other Unsecured Consumer Loans*		Other Optional Loans*		
	#	\$ (000's)	#	\$ (000's)	
Full Review:					
Columbus MSA Fairfield Co 2012-2013	0	0	0	0	
OH NonMSA 2012-13	0	0	0	0	

* The evaluation period for Optional Product Line(s) is from January 01, 2012 to December 31, 2013.

Table 2. Geographic Distribution of Home Purchase Loans

Geographic Distribution: HOME PURCHASE		Geography: STATE OF OH 2012-2013				Evaluation Period: JANUARY 1, 2012 TO DECEMBER 31, 2013									
Assessment Area:	Total Home Purchase Loans		Low-Income Geographies		Moderate-Income Geographies		Middle-Income Geographies		Upper-Income Geographies		Market Share (%) by Geography ¹				
	#	% of Total ^{**}	% Owner Occ Units ^{***}	% BANK Loans ^{****}	% Owner Occ Units ^{***}	% BANK Loans	% Owner Occ Units ^{***}	% BANK Loans	% Owner Occ Units ^{***}	% BANK Loans	Over all	Low	Mod	Mid	Upp
Full Review:															
Columbus MSA Fairfield Co 2012-2013	22	7.28	0.00	0.00	20.36	22.73	44.65	72.73	34.99	4.55	0.37	0.00	0.51	0.74	0.00
OH NonMSA 2012-13	280	92.72	0.99	0.00	28.71	31.07	61.56	62.14	8.73	6.79	9.64	0.00	11.72	9.72	5.70

* Based on 2013 Peer Mortgage Data -- US and PR

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

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

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

Table 3. Geographic Distribution of Home Improvement Loans

Geographic Distribution: HOME IMPROVEMENT		Geography: STATE OF OH 2012-2013				Evaluation Period: JANUARY 1, 2012 TO DECEMBER 31, 2013					Market Share (%) by Geography*				
Assessment Area:	Total Home Improvement Loans		Low-Income Geographies		Moderate-Income Geographies		Middle-Income Geographies		Upper-Income Geographies		Overall	Low	Mod	Mid	Upp
	#	% of Total**	% Owner Occ Units***	% BANK Loans****	% Owner Occ Units***	% BANK Loans	% Owner Occ Units***	% BANK Loans	% Owner Occ Units***	% BANK Loans					
Full Review:															
Columbus MSA Fairfield Co 2012-2013	5	7.81	0.00	0.00	20.36	20.00	44.65	60.00	34.99	20.00	1.30	0.00	2.08	1.92	0.00
OH NonMSA 2012-13	59	92.19	0.99	0.00	28.71	35.59	61.56	57.63	8.73	6.78	13.39	0.00	18.82	11.36	14.29

* Based on 2013 Peer Mortgage Data -- US and PR

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

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

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

Table 4. Geographic Distribution of Home Mortgage Refinance Loans

Geographic Distribution: HOME MORTGAGE REFINANCE		Geography: STATE OF OH 2012-2013					Evaluation Period: JANUARY 1, 2012 TO DECEMBER 31, 2013					Market Share (%) by Geography				
Assessment Area:	Total Home Mortgage Refinance Loans		Low-Income Geographies		Moderate-Income Geographies		Middle-Income Geographies		Upper-Income Geographies		Overall	Low	Mod	Mid	Upp	
	#	% of Total**	% Owner Occ Units***	% BANK Loans****	% Owner Occ Units***	% BANK Loans	% Owner Occ Units***	% BANK Loans	% Owner Occ Units***	% BANK Loans						
Full Review:																
Columbus MSA Fairfield Co 2012-2013	53	8.92	0.00	0.00	20.36	26.42	44.65	60.38	34.99	13.21	0.47	0.00	1.03	0.56	0.18	
OH NonMSA 2012-13	541	91.08	0.99	0.18	28.71	26.62	61.56	66.54	8.73	6.65	8.27	5.00	8.53	8.72	5.77	

* Based on 2013 Peer Mortgage Data -- US and PR

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

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

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

Table 5. Geographic Distribution of Multifamily Loans

Geographic Distribution: MULTIFAMILY		Geography: STATE OF OH 2012-2013					Evaluation Period: JANUARY 1, 2012 TO DECEMBER 31, 2013					Market Share (%) by Geography				
Assessment Area:	Total Multifamily Loans		Low-Income Geographies		Moderate-Income Geographies		Middle-Income Geographies		Upper-Income Geographies		Overall	Low	Mod	Mid	Upp	
	#	% of Total**	% of MF Units***	% BANK Loans****	% MF Units***	% BANK Loans	% MF Units***	% BANK Loans	% MF Units***	% BANK Loans						
Full Review:																
Columbus MSA Fairfield Co 2012-2013	0	0.00	0.00	0.00	45.74	0.00	44.20	0.00	10.06	0.00	0.00	0.00	0.00	0.00	0.00	
OH NonMSA 2012-13	6	100.00	12.38	0.00	26.87	33.33	54.93	33.33	5.81	33.33	22.73	0.00	33.33	18.18	50.00	

* Based on 2013 Peer Mortgage Data -- US and PR

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

*** Percentage of Multi Family Units is the number of multi family units in a particular geography divided by the number of multifamily housing units in the area based on 2010 Census information.

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

Table 6. Geographic Distribution of Small Loans to Businesses

Geographic Distribution: SMALL LOANS TO BUSINESSES															Geography: STATE OF OH 2012-2013					Evaluation Period: JANUARY 1, 2012 TO DECEMBER 31, 2013				
Assessment Area:	Total Small Business Loans		Low-Income Geographies		Moderate-Income Geographies		Middle-Income Geographies		Upper-Income Geographies		Market Share (%) by Geography*													
	#	% of Total**	% of Businesses***	% BANK Loans	% of Businesses***	% BANK Loans	% of Businesses***	% BANK Loans	% of Businesses***	% BANK Loans	Overall	Low	Mod	Mid	Upp									
Full Review:																								
Columbus MSA Fairfield Co 2012-2013	54	21.09	0.00	0.00	25.47	12.96	41.66	83.33	32.87	3.70	1.61	0.00	0.50	3.63	0.31									
OH NonMSA 2012-13	202	78.91	2.51	0.50	29.08	20.30	60.02	73.76	8.39	5.45	4.67	0.00	2.85	6.16	3.41									

* Based on 2013 Peer Small Business Data -- US and PR

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

*** Source Data - Dun and Bradstreet (2013).

Table 7. Geographic Distribution of Small Loans to Farms

Geographic Distribution: SMALL LOANS TO FARMS															Geography: STATE OF OH 2012-2013					Evaluation Period: JANUARY 1, 2012 TO DECEMBER 31, 2013				
Assessment Area:	Total Small Farm Loans		Low-Income Geographies		Moderate-Income Geographies		Middle-Income Geographies		Upper-Income Geographies		Market Share (%) by Geography*													
	#	% of Total**	% of Farms***	% BANK Loans	% of Farms***	% BANK Loans	% of Farms***	% BANK Loans	% of Farms***	% BANK Loans	Overall	Low	Mod	Mid	Upp									
Full Review:																								
Columbus MSA Fairfield Co 2012-2013	0	0.00	0.00	0.00	11.26	0.00	63.11	0.00	25.63	0.00	0.00	0.00	0.00	0.00	0.00									
OH NonMSA 2012-13	2	100.00	0.21	0.00	21.31	50.00	68.06	50.00	10.41	0.00	3.17	0.00	9.09	2.70	0.00									

* Based on 2013 Peer Small Business Data -- US and PR

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

*** Source Data - Dun and Bradstreet (2013).

Table 8. Borrower Distribution of Home Purchase Loans

Borrower Distribution: HOME PURCHASE		Geography: STATE OF OH 2012-2013					Evaluation Period: JANUARY 1, 2012 TO DECEMBER 31, 2013					Market Share ¹				
Assessment Area:	Total Home Purchase Loans		Low-Income Borrowers		Moderate-Income Borrowers		Middle-Income Borrowers		Upper-Income Borrowers		Overall	Low	Mod	Mid	Upp	
	#	% of Total ^{**}	% Families ^{***}	% BANK Loans ^{****}	% Families ¹²	% BANK Loans ^{****}	% Families ^{***}	% BANK Loans ^{****}	% Families ^{***}	% BANK Loans ^{****}						
Full Review:																
Columbus MSA Fairfield Co 2012-2013	22	7.28	19.49	16.67	18.74	27.78	22.64	16.67	39.12	38.89	0.28	1.08	0.38	0.00	0.26	
OH NonMSA 2012-13	280	92.72	24.77	9.64	19.17	29.32	21.17	26.91	34.89	34.14	9.74	9.56	9.23	9.94	10.04	

* Based on 2013 Peer Mortgage Data -- US and PR

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

*** Percentage of Families is based on the 2010 Census information.

**** As a percentage of loans with borrower income information available. No information was available for 11.6% of loans originated and purchased by bank.

¹² Data shown includes only One to Four-family and manufactured housing. (Property type of 1 or 2)

Table 9. Borrower Distribution of Home Improvement Loans

Borrower Distribution: HOME IMPROVEMENT															Geography: STATE OF OH 2012-2013					Evaluation Period: JANUARY 1, 2012 TO DECEMBER 31, 2013				
Assessment Area:	Total Home Improvement Loans		Low-Income Borrowers		Moderate-Income Borrowers		Middle-Income Borrowers		Upper-Income Borrowers		Market Share*													
	#	% of Total**	% Families**	% BANK Loans****	% Families ¹³	% BANK Loans****	% Families***	% BANK Loans****	% Families***	% BANK Loans****	Overall	Low	Mod	Mid	Upp									
Full Review:																								
Columbus MSA Fairfield Co 2012-2013	5	7.81	19.49	0.00	18.74	60.00	22.64	20.00	39.12	20.00	1.35	0.00	4.55	1.45	0.00									
OH NonMSA 2012-13	59	92.19	24.77	10.53	19.17	22.81	21.17	33.33	34.89	33.33	14.06	11.76	14.08	17.57	12.69									

* Based on 2013 Peer Mortgage Data -- US and PR

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

*** Percentage of Families is based on the 2010 Census information.

**** As a percentage of loans with borrower income information available. No information was available for 3.1% of loans originated and purchased by bank.

¹³ Data shown includes only One to Four-family and manufactured housing. (Property type of 1 or 2)

Table 10. Borrower Distribution of Home Mortgage Refinance Loans

Borrower Distribution: HOME MORTGAGE REFINANCE															Geography: STATE OF OH 2012-2013					Evaluation Period: JANUARY 1, 2012 TO DECEMBER 31, 2013				
Assessment Area:	Total Home Mortgage Refinance Loans		Low-Income Borrowers		Moderate-Income Borrowers		Middle-Income Borrowers		Upper-Income Borrowers		Market Share ¹													
	#	% of Total ^{**}	% Families ^{***}	% BANK Loans ^{****}	% Families ¹⁴	% BANK Loans ^{****}	% Families ^{***}	% BANK Loans ^{****}	% Families ^{***}	% BANK Loans ^{****}	Overall	Low	Mod	Mid	Upp									
Full Review:																								
Columbus MSA	53	8.92	19.49	9.62	18.74	17.31	22.64	19.23	39.12	53.85	0.55	0.77	0.51	0.12	0.77									
Fairfield Co 2012-2013																								
OH NonMSA 2012-13	541	91.08	24.77	6.46	19.17	24.33	21.17	29.09	34.89	40.11	9.02	7.58	14.48	9.88	6.81									

* Based on 2013 Peer Mortgage Data -- US and PR

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

*** Percentage of Families is based on the 2010 Census information.

**** As a percentage of loans with borrower income information available. No information was available for 2.7% of loans originated and purchased by bank.

¹⁴ Data shown includes only One to Four-family and manufactured housing. (Property type of 1 or 2)

Table 11. Borrower Distribution of Small Loans to Businesses

Borrower Distribution: SMALL LOANS TO BUSINESSES									
Geography: STATE OF OH 2012-2013					Evaluation Period: JANUARY 1, 2012 TO DECEMBER 31, 2013				
Assessment Area:	Total Small Loans to Businesses		Businesses With Revenues of \$1 million or less		Loans by Original Amount Regardless of Business Size			Market Share*	
	#	% of Total**	% of Businesses***	% BANK Loans****	\$100,000 or less	>\$100,000 to \$250,000	>\$250,000 to \$1,000,000	All	Rev\$ 1 Million or Less
Full Review:									
Columbus MSA Fairfield Co 2012-2013	54	21.09	73.32	46.30	70.37	20.37	9.26	1.61	2.05
OH NonMSA 2012-13	202	78.91	71.16	81.19	78.22	11.39	10.40	4.67	8.54

* Based on 2013 Peer Small Business Data -- US and PR

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

*** Businesses with revenues of \$1 million or less as a percentage of all businesses (Source D&B - 2013).

**** Small loans to businesses with revenues of \$1 million or less as a percentage of all loans reported as small loans to businesses. No information was available for 0.00% of small loans to businesses originated and purchased by the bank.

Table 12. Borrower Distribution of Small Loans to Farms

Borrower Distribution: SMALL LOANS TO FARMS		Geography: STATE OF OH 2012-2013			Evaluation Period: JANUARY 1, 2012 TO DECEMBER 31, 2013				
Assessment Area:	Total Small Loans to Farms		Farms With Revenues of \$1 million or less		Loans by Original Amount Regardless of Farm Size			Market Share*	
	#	% of Total**	% of Farms***	% BANK Loans****	\$100,000 or less	>\$100,000 to \$250,000	>\$250,000 to \$500,000	All	Rev\$ 1 Million or Less
Full Review:									
Columbus MSA Fairfield Co 2012-2013	0	0.00	98.81	0.00	0.00	0.00	0.00	0.00	0.00
OH NonMSA 2012-13	2	100.00	99.37	50.00	100.00	0.00	0.00	3.17	2.78

* Based on 2013 Peer Small Business Data -- US and PR

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

*** Farms with revenues of \$1 million or less as a percentage of all farms (Source D&B - 2013).

**** Small loans to farms with revenues of \$1 million or less as a percentage of all loans reported as small loans to farms. No information was available for 50.00% of small loans to farms originated and purchased by the bank.

Table 14. Qualified Investments

QUALIFIED INVESTMENTS		Geography: STATE OF OH 2012-2013				Evaluation Period: JANUARY 1, 2012 TO DECEMBER 31, 2013			
Assessment Area:	Prior Period Investments [*]		Current Period Investments		Total Investments			Unfunded Commitments ^{**}	
	#	\$(000's)	#	\$(000's)	#	\$(000's)	% of Total	#	\$(000's)
Full Review:									
Columbus MSA Fairfield Co 2012-2013	2	200	6	2,471	8	2,671	37.00	0	0
OH NonMSA 2012-13	2	670	6	3,581	8	4,251	67.00	0	0

* 'Prior Period Investments' means investments made in a previous period that are outstanding as of the examination date.

** 'Unfunded Commitments' means legally binding investment commitments that are tracked and recorded by the institution's financial reporting system.

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

DISTRIBUTION OF BRANCH DELIVERY SYSTEM AND BRANCH OPENINGS/CLOSINGS				Geography: STATE OF OH 2012-2013				Evaluation Period: JANUARY 1, 2012 TO DECEMBER 31, 2013									
MA/Assessment Area:	Deposits	Branches						Branch Openings/Closings				Population					
	% of Rated Area Deposits in AA	# of BANK Branches	% of Rated Area Branches in AA	Location of Branches by Income of Geographies (%)				# of Branch Openings	# of Branch Closings	Net change in Location of Branches (+ or -)				% of Population within Each Geography			
				Low	Mod	Mid	Upp			Low	Mod	Mid	Upp	Low	Mod	Mid	Upp
Full Review:																	
Columbus MSA Fairfield Co 2012-2013	10.30	3	0.00	0.00	3	0.00	0.00	1	2	0	0	0	-1	0.00	24.34	43.75	31.92
OH NonMSA 2012-13	89.70	21	0.00	1	10	10	0.00	2	3	0	-3	1	1	5.35	28.91	58.09	7.65

Distribution of Branch and ATM Delivery System

Distribution of Branch and ATM Delivery System																	
Geography: STATE OF OH 2012-2013																	
Evaluation Period: JANUARY 1, 2012 TO DECEMBER 31, 2013																	
MA/Assessment Area:	Deposits	Branches						ATMs						Population			
	% of Total Bank Deposits	# of Bank Branches	% of Total Bank Branches	Location of Branches by Income of Geographies (%)				#of Bank ATMs	% of Total Bank ATMs	Location of ATMs by Income of Geographies				% of Population within Each Geography			
				Low	Mod	Mid	Upp			Low	Mod	Mid	Upp	Low	Mod	Mid	Upp
Full Review:																	
Columbus MSA Fairfield Co 2012-2013	10.30	3	0.00	0	3	0	0	3	23.07	0	0	3	0	0.00	24.34	43.75	31.92
OH NonMSA 2012-13	89.70	21	0.00	1	10	10	0	10	76.92	1	4	4	1	5.35	28.91	58.09	7.65

Institution ID: PEOPLES BANK, NATIONAL ASSOCIA (10000005552) (Included)

Columbus MSA Fairfield Co 2012-2013

Demographic Information for Full Scope Area: Columbus MSA Fairfield Co 2012-2013						
Demographic Characteristics	#	Low % of #	Moderate % of #	Middle % of #	Upper % of #	NA* % of #
Geographies (Census Tracts/BNAs)	28	0.00	28.57	46.43	25.00	0.00
Population by Geography	146,156	0.00	24.34	43.75	31.92	0.00
Owner-Occupied Housing by Geography	40,877	0.00	20.36	44.65	34.99	0.00
Business by Geography	10,201	0.00	25.47	41.66	32.87	0.00
Farms by Geography	675	0.00	11.26	63.11	25.63	0.00
Family Distribution by Income Level	39,807	19.49	18.74	22.64	39.12	0.00
Distribution of Low and Moderate Income Families throughout AA Geographies	15,220	0.00	35.53	46.61	17.86	0.00
Median Family Income		66,337	Median Housing Value		163,199	
HUD Adjusted Median Family Income for 2013		67,900	Unemployment Rate (2010 US Census)		3.52%	
Households Below Poverty Level		10%				

(*) The NA category consists of geographies that have not been assigned an income classification.
Source: 2010 US Census and 2013 HUD updated MFI

Institution ID: PEOPLES BANK, NATIONAL ASSOCIA (10000005552) (Included)

OH NonMSA 2012-13

Demographic Information for Full Scope Area: OH NonMSA 2012-13						
Demographic Characteristics	#	Low % of #	Moderate % of #	Middle % of #	Upper % of #	NA* % of #
Geographies (Census Tracts/BNAs)	64	4.69	32.81	54.69	7.81	0.00
Population by Geography	275,321	5.35	28.91	58.09	7.65	0.00
Owner-Occupied Housing by Geography	74,058	0.99	28.71	61.56	8.73	0.00
Business by Geography	18,895	2.51	29.08	60.02	8.39	0.00
Farms by Geography	1,431	0.21	21.31	68.06	10.41	0.00
Family Distribution by Income Level	68,940	24.77	19.17	21.17	34.89	0.00
Distribution of Low and Moderate Income Families throughout AA Geographies	30,292	2.55	36.90	56.36	4.19	0.00
Median Family Income		52,111	Median Housing Value		101,967	
HUD Adjusted Median Family Income for 2013		53,000	Unemployment Rate (2010 US Census)		4.76%	
Households Below Poverty Level		20%				

(*) The NA category consists of geographies that have not been assigned an income classification.
Source: 2010 US Census and 2013 HUD updated MFI

