

PUBLIC DISCLOSURE

February 28, 2022

COMMUNITY REINVESTMENT ACT PERFORMANCE EVALUATION

The Ohio Valley Bank Company
RSSD #498317

420 Third Avenue
Gallipolis, Ohio 45631

Federal Reserve Bank of Cleveland

P.O. Box 6387
Cleveland, OH 44101-1387

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

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INSTITUTION'S COMMUNITY REINVESTMENT ACT (CRA) RATING

The Ohio Valley Bank Company (Ohio Valley) is rated "Outstanding".

The Lending Test is rated: "Satisfactory".

The Community Development Test is rated: "Outstanding".

The major factors and criteria contributing to this rating include:

- The net loan-to-deposit (NLTD) ratio is reasonable given the institution's size, financial condition, and assessment area (AA) credit needs;
- A majority of loans and other lending-related activities are in the AA;
- The distribution of loans to borrowers reflects a reasonable penetration among individuals of different income, including low- and moderate-income (LMI) levels and poor penetration among businesses of different sizes;
- The geographic distribution of loans reflects a reasonable dispersion throughout the AA;
- There were no CRA-related complaints filed against the bank since the previous CRA examination; and,
- The bank's community development performance demonstrates an excellent responsiveness to the community development needs of the AA, considering the bank's capacity and the need and availability of such opportunities in the bank's AA.

SCOPE OF EXAMINATION

The Federal Financial Institutions Examination Council's (FFIEC's) *Interagency Examination procedures for Intermediate Small Institutions* was utilized to evaluate Ohio Valley's CRA Performance under Regulation BB. The evaluation considered CRA performance context, including Ohio Valley's asset size, financial condition, business strategy and market competition, as well as the demographics, economic characteristics, and credit needs of the AAs. The following data was reviewed:

- 13-quarter average NLTD ratio
- Ohio Valley's CRA performance was evaluated based on HMDA-reportable lending data for the period of January 1, 2019, through June 30, 2021. HMDA loans are comprised of home purchase, refinance, home improvement, multi-family, and other purpose closed-end loans. Due to limited loan volumes, all HMDA products were combined to conduct a meaningful analysis in the Huntington-Ashland AA and Nonmetropolitan West Virginia in first half 2021, 2019, and 2018. Home purchase and refinance loans were evaluated separately each year in Nonmetropolitan Ohio and in the Huntington-Ashland AA and Nonmetropolitan West Virginia in 2020. Home improvement, multi-family, and other purpose closed-end loans were not considered separately in this evaluation. The evaluation period for consumer lending and home equity lines of credit (HELOCs) is July 1, 2020, through June 30, 2021. Non-reportable consumer loans are comprised of motor

vehicle, other secured, and other unsecured loans. Consumer loan products were evaluated separately in each AA. HELOCs were only evaluated in Nonmetropolitan Ohio, the only AA with enough volume to conduct a meaningful analysis. The evaluation period for small business lending is January 1, 2020, through June 30, 2021. Small farm loans were not considered in this evaluation.

- Community development activities were reviewed for the period between March 11, 2019, through February 28, 2022, as part of this evaluation. Community development activities are comprised of community development loans, investments, and services.
- Lending performance in low-, moderate-, middle-, and upper-income census tracts and to low-, moderate-, middle-, and upper-income borrowers was considered for each product; however, comments for activity in middle- and upper-income tracts and to middle- and upper-income borrowers are only included when they impacted the outcome of the analyses.

As a full-service interstate bank, the scope of this evaluation includes a full-scope evaluation of at least one AA in each state where Ohio Valley has deposit-taking facilities. The determination of which AAs received full-scope versus limited-scope evaluations was based on the following criteria: the volume of lending by number of loans and dollar amount as a percentage of overall and statewide lending activity, deposit market share, number of branches, percentage of deposits, percentage of low- and moderate-income geographies, volume of community development activity, and other non-financial considerations. Lastly, AAs not subject to full-scope reviews at the previous evaluation were considered to ensure in-depth analyses of all AAs with deposit-taking facilities receive full-scope evaluations at some time. Ohio Valley has the following three CRA delineated AAs:

- Nonmetropolitan Ohio – Full-scope evaluation
 - Consists of the entirety of Gallia, Jackson, Meigs, Pike, and Vinton counties
- Huntington-Ashland WV-KY-OH MSA #26580 (Huntington-Ashland) – Full-scope evaluation¹
 - Consists of the entirety of Cabell County in West Virginia (excluding Putnam and Wayne counties in West Virginia; Boyd, Carter, and Greenup counties in Kentucky; and Lawrence County in Ohio)
- Nonmetropolitan West Virginia – Limited-scope evaluation
 - Consists of the entirety of Mason County

During the evaluation period, Ohio Valley exited the Columbus OH MSA #18140 (Columbus) market in December 2019. Because the HMDA evaluation period is January 1, 2018, through June 30, 2021, the Columbus MSA was only in the bank's delineated CRA footprint for slightly more

¹ While the Huntington-Ashland MSA is a multi-state metropolitan area, lending and community development activity is being evaluated in the State of West Virginia, because the bank has no branches or deposit-taking ATMs in Kentucky or Ohio. .

than half of the evaluation period. While this would typically result in including the Columbus MSA in the evaluation, there were only eight HMDA loans made in 2018 and 2019. Therefore, performance in the Columbus MSA was not considered in this evaluation, because there was no impact to the bank's performance by excluding it.

Based on the total loan volume by number and dollar amounts available, consumer loans received the greatest weight followed by HMDA loans, small business loans, and home equity lines of credit, unless otherwise stated. Nonmetropolitan Ohio was given the greatest weight in the evaluation, as it contained the largest percentage of branches and originated the largest amount of loans (by number and dollar amount) followed by the Huntington-Ashland AA and Nonmetropolitan West Virginia, respectively. Borrower distribution received more weight than geographic distribution in this evaluation, primarily because the percentage of LMI families by family income is greater than the percentage of LMI geographies across the AA. In Nonmetropolitan West Virginia there is no geographic distribution, because the AA only consists of middle-income tracts. If lending performance differed between years, more weight was given to 2020 performance, the year with the most loans by volume and dollar amount. A detailed description of each full-scope AA is presented in subsequent sections of this performance evaluation.

Aggregated lending data, which is comprised of lending activity for all other lenders reporting home mortgage loans under HMDA in the respective AAs, was used as a comparison in evaluating Ohio Valley's lending performance in 2018, 2019, and 2020.²

To better understand AA community development and credit needs, several sources were used, including publicly accessible data and information submitted by the bank. Two community contacts were conducted. The first interview was conducted with a representative from a community service organization, and the second interview was conducted with a representative from an economic development agency. Both contacts operate inside Ohio Valley's AAs. These individuals have expertise in their respective fields and are familiar with the economic, social, and demographic characteristics and community development opportunities in the AA. Information obtained from these interviews helped establish context for the communities in which Ohio Valley operates and gather information on its performance. More detailed information obtained from these contacts is included in the "Description of the Institution's Operations" section for each full-scope AA.

² As of the start of this evaluation, 2021 aggregate lender data was unavailable.

DESCRIPTION OF INSTITUTION

Ohio Valley is a community bank headquartered in Gallipolis, Ohio. The bank’s characteristics include:

- The bank is a wholly owned subsidiary of Ohio Valley Banc Corp.
- The bank has total assets of \$1.2 billion and total deposits of \$1.1 billion as of December 31, 2021.
- In addition to its main office with a full-service ATM in Gallipolis, the bank has 13 branches with full-service ATMs, 27 cash-only ATMs, and two drive-thru only branches with ATMs. The main office, nine branches, 18 cash-only ATMs, and one drive-thru only branch are in Ohio, and the remaining four branches, nine cash-only ATMs, and one drive-thru only branch are in West Virginia.
- Since the previous evaluation, the bank closed a branch in Jackson County and relocated³ a branch in Meigs County (low-income tract) in Nonmetropolitan Ohio to Mason County (middle-income tract) in Nonmetropolitan West Virginia in April/May 2019. In the Columbus MSA, the bank sold two branches, one in Madison County (moderate-income tract) and another in Pickaway County (middle-income tract) and closed a cash-only ATM in Madison County (middle-income tract) in December 2019. The bank also opened a drive-thru only branch in Mason County (middle-income tract) in Nonmetropolitan West Virginia in August 2021.
- The bank has a loan production office in Athens, Ohio (upper-income tract) which is outside its delineated footprint and closed a loan production office (middle-income tract) in April 2020 in Gallipolis.
- Ohio Valley is a full-service retail bank that offers traditional products, including deposit and checking accounts; and commercial, residential real estate, agricultural, and consumer loans. Ohio Valley’s website, ovb.com, and online and mobile banking supplements its branch and ATM networks. Customers can confirm balances and what transactions have posted, transfer funds between accounts, make a loan payment, activate/deactivate their debit card, and manage overdraft opt-in settings with the bank’s automated telephone system. Ohio Valley also offers customers online bill pay, Visa debit cards, overdraft protection, financial calculators, and trust services.

As shown in the table below, the loan portfolio composition as of December 31, 2021. Ohio Valley’s primary business focus is residential real estate.

Composition of Loan Portfolio as of December 31, 2021		
Loan Type	\$(000)	%
Construction and Land Development	33,719	4.1
Farmland	20,955	2.6
1-4 Family Residential Real Estate	292,822	35.7
Multifamily Residential Real Estate	51,906	6.3

³ Relocation distance of approximately 1.0 miles

Non-Farm Non-Residential Real Estate	175,217	21.4
Agricultural	1,125	0.1
Commercial and Industrial	84,647	10.3
Consumer	103,511	12.6
Other	56,184	6.9
Gross Loans	820,086	100.0
<i>Note: Percentages may not total 100.0 percent due to rounding.</i>		

Ohio Valley's investment portfolio as of December 31, 2021, was \$322.3 million, which represented 26.1% of total assets. Interest-bearing bank balances accounted for 41.9% of total investments, while U.S. treasury and agency securities and municipal securities comprised 54.9% and 3.2% of investments, respectively.

There are no known legal, financial or other factors impending Ohio Valley's ability to help meet the credit needs of its communities.

Ohio Valley was rated "Satisfactory" under the CRA at its previous evaluation conducted March 11, 2019. The lending was rated "Satisfactory" and community development test was rated "Outstanding."

CONCLUSIONS WITH RESPECT TO PERFORMANCE CRITERIA

Ohio Valley’s overall CRA performance is rated “Outstanding.” Details are provided below, including facts, data, and analyses used to form conclusions regarding the lending and community development test performance ratings.

LENDING TEST

Ohio Valley’s performance relative to the lending test is rated “Satisfactory” based on Ohio Valley’s loan-to-deposit ratio, AA concentration, and borrower and geographic distribution.

Net Loan-to-Deposit Ratio (NLTD)

A financial institution’s NLTD ratio is evaluated to determine the reasonableness of lending considering performance context, such as Ohio Valley’s capacity to lend, the availability of lending opportunities, the demographic and economic factors present in the AA since the previous evaluation in comparison to similarly situated FDIC-insured institutions (custom peer group). The custom peer group was selected based on asset size, market share, and the area where they are located.

Loan-to-Deposit Ratios							
The Ohio Valley Bank Company, Gallipolis, OH				Citizens Bank of Kentucky, Inc, Paintsville, KY	Premier Bank, Inc., Huntington, WV	Vinton County National Bank, McArthur, OH	CUSTOM PEER
As of Date	Net Loans \$(000s)	Total Deposits \$(000s)	Bank Ratio	Peer 1 Ratio	Peer 2 Ratio	Peer 3 Ratio	Custom Peer Ratio
December 31, 2021	813,931	1,065,732	76.4	50.9		69.3	60.1
September 30, 2021	828,306	1,055,873	78.5	54.6		69.7	62.1
June 30, 2021	830,481	1,048,123	79.2	55.5	78.8	71.5	68.6
March 31, 2021	813,820	1,036,195	78.5	55.2	80.1	69.6	68.3
December 31, 2020	831,098	998,141	83.3	60.3	78.0	75.0	71.1
September 30, 2020	835,647	949,801	88.0	63.2	84.2	77.3	74.9
June 30, 2020	813,522	916,284	88.8	61.7	82.5	79.7	74.6
March 31, 2020	756,905	850,768	89.0	71.9	86.7	82.8	80.5
December 31, 2019	755,721	826,139	91.5	73.0	84.9	86.6	81.5
September 30, 2019	763,833	861,696	88.6	77.2	83.3	85.8	82.1
June 30, 2019	758,883	852,958	89.0	79.8	84.1	86.5	83.5
March 31, 2019	762,815	867,255	88.0	78.9	81.4	84.4	81.6
December 31, 2018	758,917	851,512	89.1	78.7	81.9	87.0	82.5
Quarterly Loan-to-Deposit Ratio Average Since the Previous Evaluation			85.2	66.2	82.4	78.9	74.7

During this period, Ohio Valley’s NLTD ratio averaged 85.2%, which was above the custom peer group average of 74.7%. According to bank management, there has been a large increase in deposits (latest eight quarters), outpacing loan growth, due to direct payments to consumers and small businesses from various economic stimulus programs in response to the COVID-19 pandemic. This is a similar trend amongst other community banks. Bank management also shifted its commercial lending strategy to originate loans in a broader regional area resulting in an increasing NLTD trend. Given these factors, Ohio Valley’s NLTD ratio is considered reasonable.

Assessment Area Concentration

During the evaluation period, Ohio Valley’s lending was analyzed to determine the volume of lending inside and outside Ohio Valley’s AA. Of the bank’s total lending, 71.0% by volume and 58.0% by dollar amount were made inside the AA. Therefore, a majority of loans and other lending-related activities are in the AA.

Lending Inside and Outside the Assessment Areas								
Loan Type	Inside				Outside			
	#	#%	\$(000)	\$%	#	#%	\$(000)	\$%
Motor Vehicle	858	74.2	17,867	63.6	299	25.8	10,233	36.4
Other – Secured	256	44.3	5,671	50.6	322	55.7	5,545	49.4
Other – Unsecured	519	63.1	7,634	34.5	303	36.9	14,500	65.5
Total Consumer related	1,633	63.9	31,172	50.7	924	36.1	30,278	49.3
Home Improvement	20	87.0	1,652	92.3	3	13.0	138	7.7
Home Purchase - Conventional	617	80.1	93,345	74.0	153	19.9	32,784	26.0
Multi-Family Housing	15	48.4	10,740	42.6	16	51.6	14,456	57.4
Other Purpose Closed-End	30	88.2	2,550	88.4	4	11.8	336	11.6
Refinancing	587	84.5	85,358	80.1	108	15.5	21,187	19.9
Total HMDA related	1,269	81.7	193,645	73.8	284	18.3	68,901	26.2
Home Equity	71	83.5	5,658	80.8	14	16.5	1,346	19.2
Total Non-HMDA Residential related	71	83.5	5,658	80.8	14	16.5	1,346	19.2
Small Business	695	71.1	117,419	43.8	282	28.9	150,618	56.2
Total Small Business related	695	71.1	117,419	43.8	282	28.9	150,618	56.2
Small Farm	24	77.4	572	38.8	7	22.6	900	61.2
Total Small Farm related	24	77.4	572	38.8	7	22.6	900	61.2
Total Loans	3,692	71.0	348,464	58.0	1,511	29.0	252,044	42.0

Note: Percentages may not total 100.0 percent due to rounding.

A larger percentage of small business and consumer loans by dollar amount at 56.2% and 49.3%, respectively was outside the AA. According to bank management, given the decreasing demand for loans and increasing deposits, the bank looked for opportunities to increase lending. The bank started making government contract loans and partnered with a company that provides personal and business financing to healthcare professionals. Bank management closely monitors these loans since they tend to be larger dollar loans outside Ohio Valley’s delineated CRA footprint.

Lending to Borrowers of Different Income Levels and to Businesses of Different Sizes

This performance criterion evaluates the bank’s lending to borrowers of different income levels and businesses of different revenue sizes. The bank’s lending has an overall reasonable distribution among individuals of different income (including LMI) levels, and poor penetration among businesses of different sizes; however, small business distribution did not receive much weight since gross annual revenue information was not available for a large percentage of these

loans.. Refer to the AA summaries for additional details.

Ohio Valley facilitated loans through the U.S. government’s Paycheck Protection Program (PPP) to help small businesses impacted by the COVID-19 emergency. Consistent with intermediate small bank procedures and information provided in the March 19, 2020, joint statement on CRA Consideration for Activities in Response to COVID-19,⁴ Ohio Valley opted to have its PPP loans evaluated in the lending test. During the small business evaluation period, January 2, 2020, through June 30, 2021, the bank originated 595 PPP loans totaling \$44.6 million. Of these loans, 502 (84.0%) totaling \$36.7 million (82.0%) were made in the bank’s AAs. Shown in the table below is the breakdown of PPP loans by volume and dollar amount by AA.

PPP Loans by AA				
Area	# of Loans	% by #	\$ of Loans	% by \$
Nonmetropolitan Ohio	385	77.0%	\$21,428,850	58.0%
Huntington-Ashland MSA	65	13.0%	\$5,692,078	16.0%
Nonmetropolitan West Virginia	52	10.0%	\$9,549,997	26.0%
Total	502	100.0%	\$36,670,925	100.0%

PPP loans are considered responsive to the needs of the community during the pandemic. However, banks were not required to collect revenue data for PPP loans, since the intent of the PPP is to assist small businesses; therefore, these unique circumstances affecting borrowers and banks resulting from the COVID-19 emergency will be considered in this evaluation. As a result, the borrower distribution performance to businesses of different sizes will not receive much weight, since gross annual revenue information was not available for a large percentage of the bank’s small business loans.

Geographic Distribution of Loans

This performance criterion evaluates the bank’s distribution of lending within its AAs by income level of census tracts with consideration given to the dispersion of loans throughout the AAs. The bank’s overall geographic distribution of loans reflects reasonable distribution among the different census tracts and dispersion throughout the AAs with an overall moderate level of lending gaps. Refer to the AA summaries for additional details.

Ohio Valley deferred 810 commercial, mortgage, consumer, and home equity loan payments in 2020 and 2021 due to the COVID-19 emergency within its AAs. Of these deferrals, 77.5% helped businesses and consumers in Nonmetropolitan Ohio, 7.3% in the Huntington-Ashland AA, and

⁴ [March 19, 2020 Joint Statement](#)

15.2% in Nonmetropolitan West Virginia. Approximately 17.0% of all deferrals were in LMI tracts and the remaining were in distressed middle-income tracts. These deferrals are considered responsive to serving credit needs of LMI areas and small businesses impacted by the COVID-19 emergency.

Ohio Valley offers Rent Buster, a mortgage loan program, targeted to borrowers who can afford a mortgage payment but may not have the resources for a substantial down payment that is required for a traditional mortgage or secondary market financing. Rent Buster is designed for individuals with a good credit history to purchase a home with no money down. Rent Buster is an in-house, propriety lending program. While there are no income requirements, bank management explained this program tends to help lower-income borrowers and translates to less paperwork, lower fees (no FHA insurance or PMI required), and faster service for the home buyer. The maximum loan amount is \$150,000. During the evaluation period, Ohio Valley originated 15 Rent Buster loans (80.0% in Nonmetropolitan Ohio and 20.0% in Nonmetropolitan West Virginia). The Rent Buster mortgages were either in LMI or distressed middle-income tracts, and 60.0% were made to LMI first-time homebuyers. This loan program is considered responsive to helping serve credit needs of LMI individuals and areas, particularly because cost-burdened renters may have a difficult time saving enough monies to make a sufficient down payment to purchase a home.

Response to Complaints

Neither Ohio Valley nor this Reserve Bank has received any CRA-related complaints since the previous examination.

COMMUNITY DEVELOPMENT TEST

Ohio Valley's performance relative to the community development test is rated "Outstanding" based on Ohio Valley's excellent responsiveness to community development needs by providing community development loans, qualified donations, and community development services, considering Ohio Valley's capacity and opportunities in its AAs. Considering the high levels of poverty and unemployment and the impact of the COVID-19 emergency across the AA, Ohio Valley was able to increase its community development lending by dollar amount by 67.0% and qualified investments and donations by dollar amount by 24.0% since the previous evaluation. Ohio Valley was also able to continue to provide community development services, including but not limited to financial literacy training despite the pandemic. In April 2021, Ohio Valley received Compass Award, a monthly recognition award program launched by the Ohio Treasurer,⁵ to recognize the organizations and individuals who are working to advance financial literacy and empowerment across Ohio.

⁵ Compass Award: <https://tos.ohio.gov/compass-awards/>

Community Development Lending

Ohio Valley originated or renewed 11 community development loans totaling \$4.5 million during this evaluation period. The following table shows the total number of community development loans by purpose, number and dollar amount.

Purpose of CD Loan	#	\$
Affordable Housing	3	\$2,545,000
Services to LMI Individuals	4	\$1,170,000
Revitalization/Stabilization	4	\$790,000
Total	11	\$4,505,000

These community development loans helped support affordable housing initiatives, provide community organizations with needed funding to continue providing services targeted to LMI individuals and families, or to revitalize/stabilize moderate-income geographies across the bank's AAs.

The largest concentration of community development loans by dollar amount was in Nonmetropolitan Ohio, accounting for 83.0% of bank-wide community development lending. Because the bank was responsive to credit needs in the AA, consideration was given to a qualified community development loan, made outside the bank's delineated AA in Nonmetropolitan Ohio. The remaining 17.0% of community development lending occurred in West Virginia in the Huntington-Ashland AA. There were no community development loans in Nonmetropolitan West Virginia.

Community Development Investments

Ohio Valley had \$6.3 million in qualified community development grants, investments, and donations during the evaluation period, with 87.5% by dollar amount benefiting Nonmetropolitan Ohio and 12.5% in West Virginia mostly in the Huntington-Ashland AA.

Qualified investments consisted of two grants (\$5.2 million) benefiting Nonmetropolitan Ohio and four prior period investments, with a current book value worth approximately \$1.0 million, benefiting Nonmetropolitan Ohio and a broader regional area in the Huntington-Ashland MSA. Ohio Valley made these investments through the Federal Home Loan Bank's (FHLB) Economic Development Advance Program. This investment program is designed for banks that are engaged in lending for economic development purposes. Eligible projects under this program must support small businesses (fewer than 500 employees), meet rural or urban income guidelines, or directly benefit LMI individuals.

Ohio Valley made 56 small dollar donations totaling \$63,880 to 33 organizations during this evaluation period. The following table shows the total number of qualified donations by purpose,

number and dollar amount.

Purpose of Qualified Donation	#	\$
Services to LMI Individuals	43	\$39,480
Economic Development	5	\$12,600
Affordable Housing	3	\$10,500
Revitalization/Stabilization	7	\$1,300
Total	56	\$63,880

Most of the contributions supported organizations that provide a multitude of community services targeted to LMI people. The largest concentration of qualified donations by dollar amount benefited Nonmetropolitan Ohio, accounting for 48.0% of qualified donations. The remaining 52.0% of qualified donations benefited organizations in West Virginia mostly in the Huntington-Ashland AA.

Community Development Services

Bank officers and employees worked with a variety of community service organizations, throughout its AAs during the evaluation period. The bank’s leadership and employees served as board and committee members and provided their financial and technical expertise to at least 46 organizations with a community development purpose.

In addition to a dedicated employee managing the bank’s financial literacy program, at least three other employees provided financial literacy training to LMI elementary, middle-, high school and college students and senior citizens. The following tables shows the total number of services, organizations, and employees by purpose.

Purpose of CD Service	# of Services	# of Orgs	# of Employees
Services to LMI Individuals	50	33	14
Economic Development	18	8	7
Revitalization/Stabilization	8	4	3
Affordable Housing	2	1	1
Total	78	46	25

The largest concentration of community development services benefited Nonmetropolitan Ohio, accounting for 82.0% of total services, including several community development services provided in an adjacent county outside the bank’s delineated AA; the remaining 18.0% were in West Virginia mostly in Nonmetropolitan West Virginia. Included in the totals above is one employee who served as a board member on a revolving loan committee of an organization that helps meet credit needs through alternative forms of funding for small businesses, supporting the community development purpose of economic development, in Ohio’s Appalachian counties. This organization serves a broader regional area, which includes the bank’s AAs. Community

development services included the following:

Board and Committee Memberships – Ohio Valley’s officers and managers provided financial expertise through their involvement with community development organizations throughout the AAs by serving as board directors, loan committee members, or treasurers.

Technical Assistance – Employees provided technical assistance which included fund raising and loan application requests/approvals.

Financial Education – Ohio Valley has one full-time employee whose job is dedicated to management of the bank’s financial literacy program. The bank’s financial literacy program consists of several age-appropriate programs that are used in conjunction with the local school systems and community organizations to promote financial literacy and smart personal banking. In response to the COVID-19 pandemic and limited opportunities to hold in-person financial literacy sessions, Ohio Valley developed a virtual classroom and made it available on its website – a space where parents and kids can learn together with interactive lessons on a variety of financial topics. The space offers several free downloadable aides and four virtual classes. The bank’s primary programs include:

- OVB Classroom Adventures (in credit and savings)
 - Through a partnership with The Centsables, Ohio Valley offers superhero-themed lessons that teach the importance of making smart choices with money to students in local elementary schools. These sessions are set to coincide with the American Banker’s Association’s Get Smart About Credit and Teach Children to Save campaigns.
- OVB BANKit
 - Ohio Valley developed this program that places a banker and occasionally a guest speaker in a high school classroom one day, each month for the entire school year. Students invest mock money however they choose among several different financial instruments. During each session the banker facilitates a discussion with the students about their current standings, investment strategies, and banking. The other half of the session is dedicated to an in-depth discussion (e.g., cost of credit, budgeting, identify theft, interest, investing, etc.) topic.
- OVB Boot Camp
 - Ohio Valley developed a multi-day financial literacy workshop for 4-H members in the participating counties. The boot camp consists of lessons on the basics of banking and a mock money management game. At the end of the game, all accounts are liquidated, and the participants use the play money at an auction for real prizes.

FAIR LENDING OR OTHER ILLEGAL CREDIT PRACTICES REVIEW

Compliance with the substantive provisions of antidiscrimination and other consumer protection laws and regulations, including the Equal Credit Opportunity Act and the Fair Housing Act, was considered as part of this CRA evaluation. No evidence of a pattern or practice of discrimination on a prohibited basis or of other illegal credit practices inconsistent with helping to meet community credit needs was identified.

STATE OF OHIO

CRA RATING for State of Ohio:⁶ “Outstanding”

The Lending Test is rated: “Satisfactory”

The Community Development Test is rated: “Outstanding”

The major factors and criteria contributing to this rating include:

- The distribution of loans to borrowers reflects a reasonable penetration among individuals of different income levels (including LMI) and a poor penetration to businesses of different sizes;
- The geographic distribution of loans reflects a reasonable dispersion throughout the AA; and,
- The bank’s community development performance demonstrates an excellent responsiveness to the community development needs of the AA, considering the bank’s capacity and the need and availability of such opportunities in the bank’s AA.

SCOPE OF EXAMINATION

A full-scope review was conducted for Nonmetropolitan Ohio, which represents Ohio Valley’s entire banking operations for Ohio. The period, products evaluated, and weights assigned for this AA are consistent with the scope discussed in the Scope of Examination section of this report.

⁶For institutions with branches in two or more states in a multistate metropolitan area, this statewide evaluation is adjusted and does not reflect performance in the parts of those states contained within the multistate metropolitan area. Refer to the multistate metropolitan area rating and discussion for the rating and evaluation of the institution’s performance in that area.

NONMETROPOLITAN AREA
(Full-scope Review)

DESCRIPTION OF INSTITUTION’S OPERATIONS IN NONMETROPOLITAN OHIO

The Nonmetropolitan Ohio AA consists of the entireties of Gallia, Jackson, Meigs, Pike, and Vinton counties in the Appalachian Region of Ohio. Gallia County is in southern Ohio along the Ohio River. Jackson County is in southern Ohio and borders the northwest side of Gallia County. Meigs County is in southern Ohio along the Ohio River. Meigs County borders Gallia County to the northeast. Pike County is in southern Ohio and borders Jackson County to the east. Vinton County is in southern Ohio and borders Gallia County to the north. See Appendix A for an AA map and Appendix B for additional demographic data.

- Nonmetropolitan Ohio AA has not changed since the previous evaluation.
- Due changes to MSA designations by the Office of Management and Budget (OMB) in 2019, the AA was comprised of the following income-tract designations during the evaluation period.

Income Tract Level	2018	2019-2021
Low	1	1
Moderate	9	6
Middle	19	22
Upper	0	0
Unknown	0	0
Total	29	29

- This AA lost three moderate-income census tracts and gained two middle-income census tracts between 2018 and 2019. There were no changes to the number of low-, upper-, or unknown-income census tracts.
- During this evaluation period, the Federal Financial Institutions Examination Council (FFIEC),⁷ defined the following middle-income tracts as distressed.
 - In 2018 – 18 (95%) middle-income census tracts were designated as distressed. Four middle-income census tracts in Gallia, Meigs, and Pike counties and two in Vinton County were designated as distressed due to poverty and unemployment. Four middle-income census tracts in Jackson County were designated as distressed due to unemployment.
 - In 2019 – 22 (100%) middle-income census tracts were designated as distressed. Five middle-income census tracts in Gallia, six in Jackson, four in Meigs, and three in Vinton counties were designated as distressed due to unemployment. Four

⁷ FFIEC Distressed and Underserved Tracts - <https://www.ffiec.gov/cra/distressed.htm>

middle-income census tracts in Pike County were designated as distressed due to poverty and unemployment.

- In 2020 – 22 (100%) middle-income census tracts were designated as distressed. Six middle-income census tracts in Jackson, four in Meigs, and three in Vinton counties were designated as distressed due to unemployment. Five middle-income census tracts in Gallia County were designated as distressed due to poverty and four in Pike County were designated as distressed due to poverty and unemployment.
- In 2021 no middle-income census tracts were designated as distressed.
- As of June 30, 2021, the Federal Deposit Insurance Corporations' (FDIC) Deposit Market Share Report, ranks Ohio Valley first among nine institutions operating in the AA with a 38.3% market share. Wesbanco Bank, Inc. holds an 11.6% market share and The Farmers Bank and Savings Company holds an 11.4% market share. This leaves a residual 38.7% market share area available to the remaining six financial institutions in the AA. Deposits in Nonmetropolitan Ohio account for 78.9% of Ohio Valley's total deposits.
- The 2020 HMDA Peer Market data indicates that Ohio Valley ranks first out of 175 HMDA reporters in the AA and originated 379 loans. Peoples Bank ranked second with 191 originated loans.
- Ohio Valley operates its main office with a full-service ATM, along with nine branches with full-service ATMs, 18 cash-only ATMs, and a drive-thru only branch with an ATM in this AA.
- In Gallia County the bank has its main office, three branches, the drive-thru only branch, and four cash-only ATMs are in Gallipolis; one branch is in Rio Grande; and two cash-only ATMs are in Bidwell. The main office, the Rio Grande branch, the drive-thru only branch, and four cash-only ATMs in Gallipolis are in moderate-income tracts. The remaining three branches and two cash-only ATMs in Bidwell are in middle-income tracts. In Jackson County the bank operates two branches in Jackson, one branch in Oak Hill, and one branch in Wellston in middle-income tracts. The bank also has three cash-only ATMs in Jackson in moderate-income tracts and five cash-only ATMs in Jackson, Coalton, Wellston, and Oak Hill in middle-income tracts. In Meigs County the bank has one cash-only ATM in Pomeroy in a moderate-income tract. In Pike County the bank has one branch and one cash-only ATM in Waverly in a middle-income tract. In Vinton County the bank has a cash-only ATM in Hamden a middle-income tract.
- The cash-only ATMs are in a restaurant, courthouse, justice center, health clinic, discount grocery store, grocery stores, and gas stations.
- Since the previous evaluation, the bank closed a branch in Jackson in a middle-income tract in Jackson County and relocated a branch in Pomeroy in Meigs County (low-income tract) to Mason County (middle-income tract) in Nonmetropolitan West Virginia in April/May 2019. The bank did not open any new branches in this AA.
- The bank also closed a loan production office in Gallipolis in a middle-income tract in April 2020.

Community Contact

An interview was conducted with a community contact to provide additional information regarding the AA. The contact was with a representative from community service organization that helps individuals and families find food assistance and other wrap around social services. The contact stated that one out of three residents in Gallia County live in poverty, which is two times higher than Ohio’s poverty rate. The area’s total population is shrinking while the senior population (65 years or older) is growing. The largest share of households has an income that is less than \$10,000 a year and a median household income less than \$37,000. The contact stated that Gallia County has the ninth highest food insecurity rate in Ohio at 17.6%, which is nearly 62.0% higher than the national average; and the county’s child food insecurity rate is 23.3%, which is nearly 60.0% higher than national average. With rising inflation and the increasing cost of essentials (e.g., food, gas, rent), the demand at food banks shows no sign of relenting, and food banks were already facing greater need due to COVID-19. The contact said that Ohio Valley contributed matching funds to a food pantry grant awarded from a foundation focused on helping the Appalachian Region amid the ongoing COVID-19 crisis. These grant monies helped to meet additional needs in the community, increased accessibility of services through a mobile food pantry to better transport frozen and refrigerated items as well as the purchase of food and other necessities, including diapers, formula, wipes, and baby food. This funding also helped support a shelter for residents in the tri-county area, allowing the shelter to better meet the needs of the community. The contact believes that local banks are actively engaged in the community.

Population Characteristics

Population Change			
Assessment Area: Nonmetropolitan Ohio			
Area	2015 Population	2020 Population	Percent Change
Gallia County	30,565	29,802	-2.5
Jackson County	32,854	32,493	-1.1
Meigs County	23,473	22,678	-3.4
Pike County	28,396	27,695	-2.5
Vinton County	13,234	12,972	-2.0
Assessment Area	128,522	125,640	-2.2
Ohio	11,575,977	11,693,217	1.0

Source: 2011-2015 U.S. Census Bureau: American Community Survey
U.S. Census Bureau Vintage 2020 Population Estimates for the United States and States

- All counties in the AA experienced declines in population between 2015 and 2020, with Meigs County experiencing the largest decline of 3.4%
- 76.3% of the AA population was 18 years of age or older, the legal age to enter into a contract.
- 16.0% of the population in the AA was age 65 and over, compared to 15.1% in Ohio.

- AA population is aging and decreasing resulting in a shrinking working population or lack of labor supply and increasing demand for leisure and healthcare services.
- 2.5% of the AA’s population resides in the low-income tract compared to 19.6% that reside in moderate-income tracts.
- Jackson (Jackson County) is the most populous city in the AA with a population of 6,230 according to 2019 U.S. Census data, representing a 3.0% decrease since 2010. By contrast Richland township (Vinton County) has a population of 1,694, according to 2019 U.S. Census data, also representing a 3.0% decrease since 2010.

Income Characteristics

Borrower Income Levels														
Assessment Area: Nonmetropolitan Ohio														
FFIEC Estimated Median Family Income			Low			Moderate			Middle			Upper		
Year	\$	% Change	0	-	49.9%	50%	-	79.9%	80%	-	119.0%	120%	-	& above
2018	\$61,400		0	-	\$30,699	\$30,700	-	\$49,119	\$49,120	-	\$73,679	\$73,680	-	& above
2019	\$61,000	-0.7	0	-	\$30,499	\$30,500	-	\$48,799	\$48,800	-	\$73,199	\$73,200	-	& above
2020	\$63,400	3.9	0	-	\$31,699	\$31,700	-	\$50,719	\$50,720	-	\$76,079	\$76,080	-	& above
2021	\$64,700	2.1	0	-	\$32,349	\$32,350	-	\$51,759	\$51,760	-	\$77,639	\$77,640	-	& above

Source: 2018-2021 FFIEC Census Data

- The median family income (MFI) in the AA decreased from 2018 to 2019 but increased in 2020 and 2021. Overall, MFI increased nearly 6.0% during this timeframe, reflecting modest economic expansion.
- According to the U.S. Census data estimates, the 2015 MFI in the AA (\$47,738) is 24.1% smaller than the MFI in Ohio (\$62,817).

Poverty Rates				
Assessment Area: Nonmetropolitan Ohio				
Area	2018	2019	2020	
Gallia County	22.1	16.5	16.1	
Jackson County	16.8	17.2	15.9	
Meigs County	17.8	15.8	18.8	
Pike County	20.5	19.1	17.4	
Vinton County	19.0	18.7	16.1	
Ohio	13.8	13.0	12.6	
United States	13.1	12.3	11.9	

Source: U.S. Census Bureau Small Area Income and Poverty Estimates Program

- Poverty rates across the AA were considerably higher than the poverty rates in Ohio and the United States during the evaluation period. In 2020, Meigs County had the highest poverty rate in the AA at 18.8% which was 6.2 and 6.9 percentage points higher than Ohio’s or the nation’s poverty rates, respectively.
- Of the 33,930 families in the AA, 46.8% are designated as LMI with 17.3% living below the poverty level and are higher than Ohio’s.

- Of the 49,825 households in the AA, 21.0% are below the poverty level and 3.8% receive public assistance.

Housing Characteristics

Housing Cost Change										
Assessment Area: Nonmetropolitan Ohio										
Area	Median Housing Value					Median Gross Rent				
	2010	2015	Percent Change - 2010 to 2015	2019	Percent Change - 2015 to 2019	2010	2015	Percent Change - 2010 to 2015	2019	Percent Change - 2015 to 2019
Gallia County	\$98,100	\$94,900	-3.3	\$110,200	16.1	\$523	\$601	14.9	\$675	12.3
Jackson County	\$88,600	\$91,200	2.9	\$97,400	6.8	\$549	\$637	16.0	\$704	10.5
Meigs County	\$80,700	\$84,900	5.2	\$95,000	11.9	\$498	\$541	8.6	\$622	15.0
Pike County	\$96,400	\$95,000	-1.5	\$117,100	23.3	\$615	\$665	8.1	\$681	2.4
Vinton County	\$87,300	\$81,000	-7.2	\$91,500	13.0	\$535	\$600	12.1	\$602	0.3
Ohio	\$136,400	\$129,900	-4.8	\$145,700	12.2	\$678	\$730	7.7	\$808	10.7

Source: 2006-2010 U.S. Census Bureau: American Community Survey
2011-2015 U.S. Census Bureau: American Community Survey
2015-2019 U.S. Census Bureau: American Community Survey

- Median housing values significantly increased from 2015 to 2019, particularly in Pike County. Median housing values in Pike, Gallia, and Vinton counties increased between 13.0% to 23.3%, compared median housing values across Ohio that increased by 12.2%. Median home prices increased more than MFI during the evaluation period, making housing less affordable across the AA during this period.
- Median gross rents across the AA increased from 2015 to 2019, particularly in Meigs County. Median gross rents in Meigs, Gallia, and Jackson counties increased between 10.5% to 15.0%, compared to median gross rents across Ohio that increased by 10.7%. The rise in median gross rents indicates the need for more affordable housing, and 42.0% of all renters in the AA have rental costs that are at least 30% of their income.
- There are 58,206 housing units in the AA, of which 62.4% are owner occupied, 23.3% are rental, and 14.4% are vacant. In the low-income tract, 44.2% housing units are owner-occupied, 31.7% are rental, and 24.1% are vacant. In moderate-income tracts, 58.4% are owner-occupied, 27.6% are rental, and 14.0% are vacant. In the low-income tract, 55.8% of housing units are either rental or vacant. In moderate-income tracts, 41.6% of housing units are either rental or vacant.

- With 37.6% of housing units being either rental or vacant across the AA, there may be limited opportunities to originate HMDA loans, particularly in LMI tracts.
- The median age of housing stock in the AA is 43 years old, and 20.5% of housing units were built prior to 1950. The age of the housing stock across the AA demonstrates a potential need for home improvement lending and for refinance or home improvement loans to remove lead-based paint that was commonly used on houses and apartments built before 1978.⁸

Housing Cost Burden						
Assessment Area: Nonmetropolitan Ohio						
Area	Cost Burden – Owners			Cost Burden – Renters		
	Low Income	Moderate Income	All Owners	Low Income	Moderate Income	All Renters
Gallia County	59%	18%	18%	63%	11%	35%
Jackson County	52%	25%	19%	63%	24%	37%
Meigs County	50%	28%	19%	62%	27%	39%
Pike County	46%	22%	17%	70%	36%	44%
Vinton County	58%	24%	21%	60%	19%	42%
Assessment Area	53%	23%	18%	64%	23%	39%
Ohio	63%	32%	18%	73%	31%	41%

Cost Burden is housing cost that equals 30 percent or more of household income
Source: U.S. Department of Housing and Urban Development (HUD), 2013-2017 Comprehensive Housing Affordability Strategy

- Within the AA, 53.0% of low-income homeowners are cost-burdened, defined as having housing costs on average that are 30.0% or more of household income. In contrast, within the AA, only 23.0% of moderate-income homeowners are cost-burdened.
- This trend applies across Ohio, where low-income homeowners are cost-burdened on average more than moderate-income homeowners.
- Within the AA, 64.0% of low-income renters are cost-burdened, which is less than renters across Ohio (73.0%). Moderate-income renters are also cost-burdened less in the AA than Ohio.
- The data shows that cost burden disproportionately affects low-income homeowners and renters.
- Cost-burdened renters may have a difficult time saving enough monies to make a sufficient down payment to purchase a home or otherwise afford increasing rents.

⁸ Ohio Department of Health/Know Our Programs/Childhood Lead Poisoning

Labor, Employment and Economic Characteristics

- According to the Appalachian Regional Commission (ARC):⁹
 - Appalachian rural counties tend to have older, less diverse, and declining population than rural counties in the rest of the U.S. While improvements have been made in key economic factors such as poverty, per capita income, and high school graduation rates, Appalachia still lags the rest of the nation. For the Region to recover from economic disruptions, address the substance abuse crisis, and attract additional investment, more work is needed.
 - As of fiscal year 2021, Meigs County's economy was classified as distressed and Gallia, Jackson, Pike, and Vinton counties' economies as at-risk. According to ARC's economic classification system for Appalachian counties, distressed counties are the most economically depressed counties in the nation, and at-risk counties are at risk of becoming economically distressed.
- Pike, Jackson, Meigs, Vinton, and Gallia counties, respectively have been significantly impacted by the opioid epidemic. As indicated in *The Opioid Epidemic and Its Effects: A Perspective on What We Know from the Federal Reserve Bank of Cleveland*,¹⁰ recent research suggests that counties that have higher levels of opioid prescriptions have substantially lower prime-age labor force participation rates and reduced labor market activity, which ultimately impacts economic growth potential of a local area.
- According to Ohio Office of Research:¹¹
 - Land use in Gallia, Jackson, Meigs, Pike, and Vinton counties is primarily rural with less than 7.0% available for urban (i.e., residential, commercial, industrial, or recreational) development.
 - The counties in the AA are most impacted by the industries of professional and business services; education and health services; trade, transportation, and utilities; manufacturing; and local government. Major employers include but are not limited to manufacturers such as ElectroCraft, GKN Sinter Metals, Osco Industries, and Austin Powder Company; local county and city schools; Bellisio Foods; Holzer Health System, Holzer Medical Center, Adena Pike Medical Center, nursing homes, and rehab centers; utilities such as Lightstone Generation and Ohio Valley Electric Corporation; University of Rio Grande; state government, and Wal-Mart Stores. The AA's median average weekly wage for the private sector is \$717, which indicates that employed persons could afford the median rent of \$704.

⁹ ARC: <https://www.arc.gov/about-the-appalachian-region/>

¹⁰ Cleveland Fed: <https://www.clevelandfed.org/newsroom-and-events/publications/community-development-briefs/db-20180531-the-opioid-epidemic.aspx>

¹¹ www.development.oh.gov>reports_countytrends_map

Unemployment Rates					
Assessment Area: Nonmetropolitan Ohio					
Area	2016	2017	2018	2019	2020
Gallia County	6.9%	6.6%	6.0%	5.4%	8.0%
Jackson County	7.9%	7.1%	6.5%	6.2%	8.7%
Meigs County	8.6%	8.1%	7.2%	6.9%	9.6%
Pike County	7.6%	7.0%	6.5%	6.2%	9.4%
Vinton County	7.1%	6.8%	6.2%	5.7%	9.1%
Assessment Area	7.6%	7.1%	6.5%	6.1%	8.9%
Ohio	5.0%	5.0%	4.5%	4.2%	8.1%

Source: Bureau of Labor Statistics: Local Area Unemployment Statistics

- While 2016-2019 unemployment rates decreased across the AA, 2020 unemployment rates increased substantially in response to the COVID-19 pandemic. The average unemployment rate for the AA increased from 6.1% in 2019 to 8.9% in 2020.
- The unemployment rates across the AA were higher than unemployment rates in Ohio during this period.

CONCLUSIONS WITH RESPECT TO PERFORMANCE TESTS IN NONMETROPOLITAN OHIO

LENDING TEST

The lending test performance in Nonmetropolitan Ohio is rated "Satisfactory." Details of Ohio Valley's lending can be found in the tables in Appendix D.

Lending to Borrowers of Different Income Levels and Businesses of Different Sizes

Ohio Valley's lending penetration among borrowers of different income (including LMI) levels in Nonmetropolitan Ohio is considered reasonable.

Consumer Lending

Ohio Valley's performance was compared to the percentage of households by household income (proxy). During the evaluation period, Ohio Valley originated 1,223 consumer loans totaling \$23.1 million, and only 42 (3.4%) were made to borrowers with unknown-income designations. Overall, Ohio Valley's borrower distribution of consumer loans is reasonable.

Distribution of July 1, 2020-June 30, 2021 Consumer Loans by Borrower Income Level Assessment Area: Nonmetropolitan Ohio					
Borrower Income Level	Bank Loans				Households by Household Income %
	#	#%	\$(000)	%	
Motor Vehicle Loans					
Low	128	19.2	1,566	11.4	29.5
Moderate	148	22.3	2,661	19.4	17.2
Middle	164	24.7	3,393	24.8	17.6
Upper	210	31.6	5,620	41.0	35.6
Unknown	15	2.3	463	3.4	0.0
Total	665	100.0	13,703	100.0	100.0
Other – Secured Loans					
Low	30	17.4	324	9.1	29.5
Moderate	32	18.6	644	18.0	17.2
Middle	43	25.0	926	25.9	17.6
Upper	58	33.7	1,533	42.9	35.6
Unknown	9	5.2	149	4.2	0.0
Total	172	100.0	3,576	100.0	100.0
Other – Unsecured Loans					
Low	65	16.8	423	7.3	29.5
Moderate	92	23.8	639	11.0	17.2
Middle	85	22.0	987	17.1	17.6
Upper	126	32.6	3,592	62.1	35.6
Unknown	18	4.7	145	2.5	0.0
Total	386	100.0	5,786	100.0	100.0
Total Consumer Loans					
Low	223	18.2	2,313	10.0	29.5
Moderate	272	22.2	3,944	17.1	17.2
Middle	292	23.9	5,306	23.0	17.6
Upper	394	32.2	10,745	46.6	35.6
Unknown	42	3.4	757	3.3	0.0
Total	1,223	100.0	23,065	100.0	100.0
Source: 2020 and 2021 FFIEC Census Data 2011-2015 U.S. Census Bureau: American Community Survey					
Note: Percentages may not total 100.0 percent due to rounding.					

Motor Vehicle Lending

Ohio Valley originated 665 motor vehicle loans totaling \$13.7 million. Ohio Valley originated 126 (19.2%) of motor vehicle loans to low-income borrowers, which was below the percentage of households at 29.5%. Ohio Valley made 148 (22.3%) of motor vehicle loans to moderate-income borrowers, which exceeded the percentage of households at 17.2%.

Considering the bank's performance relative to proxy, the borrower distribution of motor vehicle loans to low-income borrowers is reasonable and excellent to moderate-income borrowers, especially considering that access to transportation is essential for improving upward social mobility for lower-income individuals and communities.

Other Unsecured Lending

Ohio Valley originated 386 unsecured consumer loans totaling \$5.8 million. Ohio Valley made 65 (16.8%) other unsecured consumer loans to low-income borrowers, which was below the percentage of households at 29.5%. Ohio Valley made 92 (23.8%) other unsecured consumer loans to moderate-income borrowers, which exceeded the percentage of households at 17.2%.

Considering the bank's performance relative to proxy, the borrower distribution of other unsecured loans to low-income borrowers is reasonable and excellent to moderate-income borrowers, especially considering access to unsecured, small dollar loans gives LMI individuals the ability to have access to smaller amounts of money to pay for items/services they could not otherwise afford.

Other Secured Lending

Ohio Valley originated 172 other secured consumer loans totaling \$3.6 million. Ohio Valley originated 30 (17.4%) of other secured consumer loans to low-income borrowers, which was below the percentage of households at 29.5%. Ohio Valley made 32 (18.6%) of other secured loans to moderate-income borrowers, which exceeded the percentage of households at 17.2%.

Considering the bank's performance relative to proxy, the borrower distribution of other secured loans to low-income borrowers is reasonable and excellent to moderate-income borrowers.

HMDA Lending

Ohio Valley's performance was compared to the percentage of families (proxy) and the aggregate of all lenders. Ohio Valley's borrower distribution of HMDA loans is reasonable. During the evaluation period, Ohio Valley originated 845 HMDA loans, totaling \$117.9 million. See Appendix D for explicit HMDA-reportable lending data.

Home Purchase Lending

In 2021 Ohio Valley originated 59 home purchase loans totaling \$8.7 million. Ohio Valley made seven (11.9%) home purchase loans to borrowers with unknown-income designations Ohio Valley made no home purchase loans to low-income borrowers, compared to the percentage of families at 27.7%. Ohio Valley made 16 (27.1%) home purchase loans to moderate-income borrowers, which exceeded the percentage of families at 19.1%.

In 2020 Ohio Valley originated 160 home purchase loans totaling \$24.4 million. Ohio Valley made 21 (13.1%) home purchase loans to borrowers with unknown-income designations. Ohio Valley made eight (5.0%) home purchase loans to low-income borrowers, which was below the percentage of families at 27.7% and the aggregate of all lenders at 7.1%. Ohio Valley made 30

(18.8%) home purchase loans to moderate-income borrowers, which was below the percentage of families at 19.1% and the aggregate of all lenders at 23.1%.

In 2019 Ohio Valley originated 105 home purchase loans totaling \$15.1 million. Ohio Valley made seven (6.7%) home purchase loans to borrowers with unknown-income designations. Ohio Valley made 11 (10.5%) home purchase loans to low-income borrowers, which was below the percentage of families at 27.7% but exceeded the aggregate of all lenders at 6.3%. Ohio Valley made 16 (19.4%) home purchase loans to moderate-income borrowers, which was below the percentage of families at 19.1% and the aggregate of all lenders at 19.4%.

In 2018 Ohio Valley originated 110 home purchase loans totaling \$13.3 million. Ohio Valley made nine (8.2%) home purchase loans to borrowers with unknown-income designations. Ohio Valley made four (3.6%) home purchase loans to low-income borrowers, which was below the percentage of families at 27.9% and the aggregate of all lenders at 8.8%. Ohio Valley made 20 (18.2%) home purchase loans to moderate-income borrowers, which was below the percentage of families at 19.2% and the aggregate of all lenders at 21.7%.

Overall Ohio Valley's performance mostly fell below proxy and the aggregate of all lenders; therefore, the borrower distribution of home purchase loans to LMI borrowers is reasonable, considering the high poverty rates and limited land suitable for residential development across the AA.

Refinance Lending

In 2021 Ohio Valley originated 60 refinance loans totaling \$7.5 million. Ohio Valley made two (3.3%) refinance loans to low-income borrowers, which was significantly below the percentage of families at 27.7%. Ohio Valley made five (8.3%) refinance loans to moderate-income borrowers, which was below the percentage of families at 19.1%.

In 2020 Ohio Valley originated 209 refinance loans totaling \$30.7 million. Ohio Valley made 14 (6.7%) refinance loans to borrowers with unknown-income designations. Ohio Valley made four (1.9%) refinance loans to low-income borrowers, which was significantly below the percentage of families at 27.7% and the aggregate of all lenders at 4.2%. Ohio Valley made 17 (8.1%) refinance loans to moderate-income borrowers, which was below the percentage of families at 19.1% and the aggregate of all lenders at 11.0%.

In 2019 Ohio Valley originated 77 refinance loans totaling \$10.6 million. Ohio Valley made three (3.9%) refinance loans to borrowers with unknown-income designations. Ohio Valley made two (2.6%) refinance loans to low-income borrowers, which was significantly below the percentage of families at 27.7% and the aggregate of all lenders at 5.5%. Ohio Valley made 11 (15.5%) refinance loans to moderate-income borrowers, which was below the percentage of families at 19.1% and comparable to the aggregate of all lenders at 15.5%.

In 2018 Ohio Valley originated 65 refinance loans totaling \$7.6 million. Ohio Valley made four (6.2%) refinance loans to borrowers with unknown-income designations. Ohio Valley made three (4.6%) refinance loans to low-income borrowers, which was significantly below the percentage of families at 27.9% and below the aggregate of all lenders at 9.7%. Ohio Valley made 10 (15.4%) refinance loans to moderate-income borrowers, which was below the percentage of families at 19.2% and the aggregate of all lenders at 22.6%.

Overall Ohio Valley's performance varied compared to proxy and the aggregate of all lenders; therefore, the borrower distribution of refinance loans to low-income borrowers is poor and reasonable to moderate-income borrowers, considering the high poverty rates.

Small Business Lending

From January 1, 2020, through June 30, 2021, Ohio Valley originated 537 small business loans totaling \$71.2 million to businesses of different sizes and 385 (71.7%) were PPP loans. Of those loans, 461 (85.8%) were made to businesses with unknown gross annual revenues and 83.3% were PPP loans.

Distribution of January 1, 2020-June 30, 2021 Small Business Lending by Revenue Size of Businesses Assessment Area: Nonmetropolitan Ohio					
	Bank Loans				Total Businesses %
	#	%	\$(000)	%	
By Revenue					
\$1 Million or Less	58	10.8	5,374	7.5	89.8
Over \$1 Million	18	3.4	11,342	15.9	7.1
Revenue Unknown	461	85.8	54,477	76.5	3.2
Total	537	100.0	71,194	100.0	100.0
By Loan Size					
\$100,000 or Less	441	82.1	12,650	17.8	
\$100,001 - \$250,000	52	9.7	8,246	11.6	
\$250,001 - \$1 Million	33	6.1	16,056	22.6	
Total	537	100.0	71,194	100.0	
By Loan Size and Revenue \$1 Million or Less					
\$100,000 or Less	46	79.3	1,910	35.5	
\$100,001 - \$250,000	6	10.3	930	17.3	
\$250,001 - \$1 Million	6	10.3	2,535	47.2	
Total	58	100.0	5,374	100.0	
<i>Source: 2020 and 2021 FFIEC Census Data 2020 Dun & Bradstreet Data 2011-2015 U.S. Census Bureau: American Community Survey</i>					
<i>Note: Percentages may not total 100.0 percent due to rounding.</i>					

Ohio Valley made 58 (10.8%) loans totaling \$5.4 million to businesses with revenues of \$1.0

million or less compared to the percentage of small businesses in the AA at 89.8%. If PPP loans had been excluded from this analysis, 37.5% of the bank’s loans were made to businesses with revenues of \$1.0 million or less, which is a poor penetration; however, 50.7% of non-PPP loans were made to businesses with unknown revenues.

While the penetration to small businesses is poor, this analysis is skewed by the large number of businesses with unknown gross annual revenues; however, Ohio Valley made 441 (82.1%) loans in amounts of \$100,000 or less. Ohio Valley’s willingness to lend in smaller amounts exhibits good responsiveness to credit needs of small businesses in the AA, particularly those impacted by the COVID-19 emergency.

Home Equity Lending

Ohio Valley originated 41 home equity loans totaling \$2.8 million. Ohio Valley originated one (2.4%) home equity loan to low-income borrowers, which was significantly below the percentage of households at 27.7%. Ohio Valley made six (14.6%) of home equity loans to moderate-income borrowers, which was below the percentage of households at 19.1%.

Distribution of July 1, 2020-June 30, 2021 Home Equity Lines of Credit by Borrower Income Level Assessment Area: Nonmetropolitan Ohio					
Borrower Income Level	Bank Loans				Families by Family Income %
	#	%	\$(000)	%	
Low	1	2.4	25	0.9	27.7
Moderate	6	14.6	240	8.5	19.1
Middle	10	24.4	573	20.3	19.1
Upper	24	58.5	1,983	70.3	34.1
Unknown	0	0.0	0	0.0	0.0
Total	41	100.0	2,821	100.0	100.0
<i>Source: 2020 and 2021 FFIEC Census Data 2011-2015 U.S. Census Bureau: American Community Survey Note: Percentages may not total 100.0 percent due to rounding.</i>					

Considering the bank’s performance relative to proxy, the borrower distribution of home equity loans to low-income borrowers is poor and reasonable to moderate-income borrowers, considering that lower-income households tend to have lower wealth accumulation or equity.

Geographic Distribution of Loans

Ohio Valley’s geographic distribution reflects a reasonable dispersion of loans in Nonmetropolitan Ohio. Ohio Valley has a low level of lending gaps in Nonmetropolitan Ohio.

Percentage of Lending Penetration				
Tract Income Level	2018	2019	2020	1/1/2021-6/30/2021
Low	100.0%	100.0%	100.0%	100.0%
Moderate	100.0%	100.0%	100.0%	100.0%
Middle	94.7%	90.9%	100.0%	100.0%
Total	96.6%	93.1%	100.0%	100.0%

Ohio Valley penetrated 100.0% of its LMI tracts and a majority of its middle-income tracts, which had high levels of unemployment and poverty each year in the evaluation period.

Ohio Valley deferred 628 commercial, mortgage, consumer, and home equity loan payments in 2020 and 2021 due to the COVID-19 emergency in Nonmetropolitan Ohio, representing 77.5% of total deferrals. Of these deferrals, approximately 22.0% were in LMI tracts and 82.0% were in distressed middle-income tracts. These deferrals are considered responsive to serving credit needs of LMI and distressed middle-income areas and small businesses impacted by the COVID-19 emergency.

During the evaluation period, Ohio Valley originated 12 Rent Buster loans in Nonmetropolitan Ohio, representing 80.0% of total loans. Of these loans, 17.0% were in the low-income tract, 33.0% were in moderate-income tracts, and 50.0% were in distressed middle-income tracts. Also, 50.0% of these loans were made to LMI first-time homebuyers. This loan program is considered responsive to helping serve credit needs of LMI individuals and areas, particularly because cost-burdened renters may have a difficult time saving enough monies to make a sufficient down payment to purchase a home.

Consumer Lending

Ohio Valley originated 1,223 consumer loans totaling \$23.1 million during the evaluation period. Ohio Valley’s performance was compared to the percentage of households by census tract (proxy). Overall Ohio Valley’s geographic distribution of consumer loans is reasonable.

Distribution of July 1, 2020-June 30, 2021 Consumer Loans by Income Level of Geography Assessment Area: Nonmetropolitan Ohio					
Geographic Income Level	Bank Loans				Households %
	#	%	\$(000)	%	
Motor Vehicle Loans					
Low	11	1.7	135	1.0	2.7
Moderate	138	20.8	2,928	21.4	18.5
Middle	516	77.6	10,640	77.6	78.9
Upper	0	0.0	0	0.0	0.0
Total	665	100.0	13,703	100.0	100.0
Other – Secured Loans					
Low	4	2.3	64	1.8	2.7
Moderate	35	20.3	754	21.1	18.5
Middle	133	77.3	2,758	77.1	78.9
Upper	0	0.0	0	0.0	0.0
Total	172	100.0	3,576	100.0	100.0
Other – Unsecured Loans					
Low	3	0.8	16	0.3	2.7
Moderate	96	24.9	1,625	28.1	18.5
Middle	287	74.4	4,145	71.6	78.9
Upper	0	0.0	0	0.0	0.0
Total	386	100.0	5,786	100.0	100.0
Total Consumer Loans					
Low	18	1.5	215	0.9	2.7
Moderate	269	22.0	5,307	23.0	18.5
Middle	936	76.5	17,543	76.1	78.9
Upper	0	0.0	0	0.0	0.0
Total	1,223	100.0	23,065	100.0	100.0
<small>Source: 2020 and 2021 FFIEC Census Data 2011-2015 U.S. Census Bureau: American Community Survey Note: Percentages may not total 100.0 percent due to rounding.</small>					

Motor Vehicle Lending

Ohio Valley originated 665 motor vehicle loans, totaling \$13.7 million. Ohio Valley made 11 (1.7%) motor vehicle loans in the low-income tract which was below the percentage of households at 2.7%. The bank made 138 (20.8%) motor vehicle loans in moderate-income tracts which exceeded the percentage of households at 18.5%. Therefore, Ohio Valley's motor vehicle lending in the low-income tract is reasonable and excellent in moderate-income tracts.

Other Unsecured Lending

Ohio Valley originated 386 other unsecured loans, totaling \$5.8 million. Ohio Valley made three (0.8%) other unsecured loans in the low-income tract which was significantly below the percentage of households at 2.7%. The bank made 96 (24.9%) other unsecured loans in moderate-income tracts which exceeded the percentage of households at 18.5%. Therefore, Ohio Valley's other unsecured lending in the low-income tract is poor and excellent in moderate-income tracts.

Other Secured Lending

Ohio Valley originated 172 other secured loans, totaling \$3.6 million. Ohio Valley made four (2.3%) other secured loans in the low-income tract which was comparable the percentage of households at 2.7%. The bank made 35 (20.3%) other secured loans in moderate-income tracts which exceeded the percentage of households at 18.5%. Therefore, Ohio Valley's other secured lending in the low-income tract is reasonable and excellent in moderate-income tracts.

HMDA Lending

During the evaluation period Ohio Valley made 845 HMDA loans, totaling \$117.9 million. Ohio Valley's performance was compared to the percentage of owner-occupied units (proxy) and the aggregate of all lenders. Ohio Valley's geographic distribution of HMDA loans is reasonable, especially considering limited opportunities to originate mortgage loans in LMI tracts which have a high percentage of rental and vacant units. See Appendix C for explicit HMDA-reportable lending data.

Home Purchase Lending

In 2021 Ohio Valley originated 59 home purchase loans totaling \$8.7 million. Ohio Valley made one (1.7%) home purchase loan in a low-income tract, which was below the percentage of owner-occupied units in these tracts at 2.1%. Ohio Valley made 18 (30.5%) home purchase loans in moderate-income tracts, which exceeded the percentage of owner-occupied units in these tracts at 17.2%.

In 2020 Ohio Valley originated 160 home purchase loans totaling \$24.4 million. Ohio Valley made three (1.9%) home purchase loans in the low-income tract, which was below the percentage of owner-occupied units in this tract at 2.1% and the aggregate of all lenders at 2.1%. Ohio Valley made 54 (33.8%) home purchase loans in moderate-income tracts, which exceeded the percentage of owner-occupied units in these tracts at 17.2% and the aggregate of all lenders at 18.9%.

In 2019 Ohio Valley originated 105 home purchase loans totaling \$15.1 million. Ohio Valley made one (1.0%) home purchase loan in a low-income tract, which was well below the percentage of owner-occupied units in this tract at 2.1% and below the aggregate of all lenders at 1.3%. Ohio Valley made 25 (23.8%) home purchase loans in moderate-income tracts, which exceeded the percentage of owner-occupied units in these tracts at 17.2% and the aggregate of all lenders at 18.0%.

In 2018 Ohio Valley originated 110 home purchase loans totaling \$13.3 million. Ohio Valley made two (1.8%) home purchase loans in the low-income tract, which was below the percentage of owner-occupied units in this tract at 2.1% but exceeded the aggregate of all lenders at 1.3%. Ohio Valley made 36 (32.7%) home purchase loans in moderate-income tracts, which exceeded the

percentage of owner-occupied units in these tracts at 25.5% and the aggregate of all lenders at 26.4%.

Overall, Ohio Valley's lending of home purchase loans fell below proxy and the aggregate of all lenders in the low-income tract and exceeded proxy and the aggregate of all lenders in moderate-income tracts. Therefore, Ohio Valley's home purchase lending in the low-income tract is poor and excellent in moderate-income tracts.

Refinance Lending

In 2021 Ohio Valley originated 60 refinance loans totaling \$7.5 million. Ohio Valley made one (1.7%) refinance loan in the low-income tract, which was below the percentage of owner-occupied units in this tract at 2.1%. Ohio Valley made 20 (33.3%) refinance loans in moderate-income tracts, which exceeded the percentage of owner-occupied units in these tracts at 17.2%.

In 2020 Ohio Valley originated 209 refinance loans totaling \$30.8 million. Ohio Valley made no refinance loans in the low-income tract, compared to the percentage of owner-occupied units in this tract at 2.1% and the aggregate of all lenders at 0.9%. Ohio Valley made 59 (28.2%) refinance loans in moderate-income tracts, which exceeded the percentage of owner-occupied units in these tracts at 17.2% and the aggregate of all lenders at 18.8%.

In 2019 Ohio Valley originated 77 refinance loans totaling \$10.6 million. Ohio Valley made no refinance loans in the low-income tract, compared to the percentage of owner-occupied units in this tract at 2.1% and the aggregate of all lenders at 0.7%. Ohio Valley made 19 (24.7%) refinance loans in moderate-income tract, which exceeded the percentage of owner-occupied units in these tracts at 17.2% and the aggregate of all lenders at 19.4%.

In 2018 Ohio Valley originated 65 refinance loans totaling \$7.6 million. Ohio Valley made one (1.5%) refinance loan in the low-income tract, which was below the percentage of owner-occupied units in this tract at 2.1% but exceeded the aggregate of all lenders at 1.1%. Ohio Valley made 23 (35.4%) refinance loans in moderate-income tracts, which exceeded the percentage of owner-occupied units in these tracts at 25.5% and the aggregate of all lenders at 26.2%.

Overall, Ohio Valley's lending of refinance loans fell below proxy and the aggregate of all lenders in the low-income tract and exceeded proxy and the aggregate of all lenders in moderate-income tracts. Therefore, Ohio Valley's refinance lending in the low-income tract is poor and excellent in moderate-income tracts.

Small Business Lending

From January 1, 2020 through June 30, 2021, Ohio Valley originated 537 small business loans totaling \$71.2 million.

Distribution of January 1, 2020-June 30, 2021 Small Business Lending by Income Level of Geography Assessment Area: Nonmetropolitan Ohio					
Geographic Income Level	Bank Loans				Total Businesses %
	#	#%	\$(000)	%	
Low	1	0.2	6	0.0	3.0
Moderate	146	27.2	32,917	46.2	21.5
Middle	390	72.6	38,270	53.8	75.5
Upper	0	0.0	0	0.0	0.0
Total	537	100.0	71,194	100.0	100.0
<i>Source: 2020 and 2021 FFIEC Census Data 2020 Dun & Bradstreet Data 2011-2015 U.S. Census Bureau: American Community Survey</i>					
<i>Note: Percentages may not total 100.0 percent due to rounding.</i>					

Ohio Valley made one (0.2%) small business loan in the low-income tract, which was significantly below the percentage of businesses in this tract at 3.0%. Ohio Valley made 146 (27.2%) small business loans in moderate-income tracts, which exceeded the percentage of businesses in these tracts at 21.5%. Therefore, the geographic distribution of small business loans in the low-income tract is poor and excellent in moderate-income tracts.

Home Equity Lending

From July 1, 2020 through June 30, 2021, Ohio Valley originated 41 home equity loans, totaling \$2.8 million.

Distribution of July 1, 2020-June 30, 2021 Home Equity Lines of Credit by Income Level of Geography Assessment Area: Nonmetropolitan Ohio					
Geographic Income Level	Bank Loans				Owner Occupied Units %
	#	#%	\$(000)	%	
Low	1	2.4	20	0.7	2.1
Moderate	14	34.1	943	33.4	17.2
Middle	26	63.4	1,858	65.9	80.6
Upper	0	0.0	0	0.0	0.0
Total	41	100.0	2,821	100.0	100.0
<i>Source: 20220 and 2021 FFIEC Census Data 2011-2015 U.S. Census Bureau: American Community Survey</i>					
<i>Note: Percentages may not total 100.0 percent due to rounding.</i>					

Ohio Valley made one (2.4%) home equity loan in the low-income tract which exceeded the percentage of households at 2.1%. The bank made 14 (34.1%) home equity loans in moderate-

income tracts which significantly exceeded the percentage of households at 17.2%. Therefore, the geographic distribution in LMI tracts is excellent.

COMMUNITY DEVELOPMENT TEST

Ohio Valley community development performance demonstrates excellent responsiveness to community development needs in this AA by providing community development loans, qualified investments and donations, and community development services, considering Ohio Valley’s capacity and opportunities in this AA. These community development activities are considered responsive to community development needs because these activities help to address the high levels of poverty and unemployment across the AA, including but not limited to tackling food insecurity which the community contact stated is an ever-increasing need.

Community Development Lending

Ohio Valley originated or renewed nine community development loans totaling \$2.7 million during this evaluation period. The following table shows the total number of community development loans by purpose, number and dollar amount.

Purpose of CD Loan	#	\$
Community Services to LMI	4	\$1,170,000
Revitalization/stabilization	4	\$790,000
Affordable Housing	1	\$755,000
Total	9	\$2,715,000

Community development loans in Nonmetropolitan Ohio represent 83.0% of total community development lending by dollar amount. The four community services loans that helped LMI individuals and families provided funding to four organizations in the form of interim financing to a drug rehabilitation program and public health agency, a commercial loan to a nurse practitioner to purchase a building to provide expanded medical care, and a line of credit to a non-profit to renovate a building to accommodate a 16-bed drug rehabilitation facility for women (Ohio Valley also made a small dollar loan to this organization). The four revitalization/stabilization loans provided working capital to four small businesses in moderate- or distressed middle-income tracts. These loans helped two start-up businesses and two existing businesses to expand, resulting in the creation of at least six new permanent jobs and the retention of at least five jobs. For instance one of these loans helped an existing veteran-owned small business undertake more green solar panel jobs. The affordable housing loan provided funding to a non-profit to continue making improvements to a 62-unit apartment building for LMI senior citizens in a distressed middle-income.

Because the bank was responsive to credit needs in the AA, consideration was given to a qualified community development loan, totaling approximately \$1.0 million, supporting affordable

housing for LMI seniors (84 units) in an adjacent county outside the bank’s delineated AA. This property has received funding in part through the Low-Income Housing Tax Credit (LIHTC) program.

Community Development Investments

Ohio Valley had \$6.3 million in qualified community development grants, investments, and donations during the evaluation period, representing 87.5% of total qualified investments by dollar amount.

Ohio Valley made two grants, totaling approximately \$5.2 million, which helped revitalize a bank-owned building in a moderate-income tract in downtown Gallipolis. The building includes a museum with exhibitions of the bank’s local history and a community center available for use by local community groups. Ohio Valley will also conduct financial literacy classes primarily targeted to LMI individuals at the community center. This multi-year revitalization project also qualified for a grant from JobsOhio Revitalization.¹²

Ohio Valley had three prior period investments through the FHLB Economic Development Advance Program, with a current book value worth approximately \$274,677. These investments benefited two small businesses and school district with a majority student body eligible for the free- and reduced-lunch program in Nonmetropolitan Ohio.

Ohio Valley made 56 small dollar donations totaling \$63,880 to 33 organizations during this evaluation period, accounting for 48.0% of total qualified donations by dollar amount. The following table shows the total number of qualified donations by purpose, number and dollar amount.

Purpose of Qualified Donation	#	\$
Services to LMI Individuals	43	\$39,480
Economic Development	5	\$12,600
Affordable Housing	3	\$10,500
Revitalization/Stabilization	7	\$1,300
Total	56	\$63,880

Most of these small dollar contributions supported organizations that provide a multitude of community services, including but not limited to supporting the creation of greenspace in a distressed middle-income community, multiple LMI schools/students, and a new substance abuse center for women (Ohio Valley also made a community development loan to this organization). The largest donations helped support LMI Appalachian youth (\$10,000),

¹² JobsOhio Revitalization Program offers loans and grants to companies to redevelop underutilized properties (both land and buildings) to put them back into productive use.

affordable housing (\$10,000), food pantries (\$3,300), and economic development (\$2,500). The community contact specifically mentioned Ohio Valley’s donation to a local food pantry was responsive.

Community Development Services

During the evaluation period, 18 bank officers and employees provided their leadership and financial and technical expertise to at least 32 organizations with a community development purpose. The following tables shows the total number of services, organizations, and employees by purpose.

Purpose of CD Service	# of Services	# of Orgs	# of Employees
Services to LMI Individuals	35	23	10
Economic Development	12	5	5
Revitalization/Stabilization	6	3	2
Affordable Housing	2	1	1
Total	55	32	18

Community development services in Nonmetropolitan Ohio account for 71.0% of total services. A majority of services provided leadership and financial expertise through board and committee membership to a multitude of organizations that address essential needs of LMI individuals and families, promote economic development, revitalization/stabilization of distressed and LMI areas, and housing needs. For example, bank staff provided expertise on several committees that helped determine the allocation of funds for delivering wraparound services to LMI individuals and families, affordable housing, healthcare, and strategies to encourage economic development. Technical expertise included providing several non-profits with budgeting, fundraising, setting scholarship selection criteria, counseling for small business regulatory matters, and business advisory services. Lastly, four employees conducted 20 financial literacy training sessions in 14 venues reaching at least 603 LMI students, adults, senior citizens, and first-time homebuyers.

Because the bank was responsive to credit needs in Nonmetropolitan Ohio, consideration was given to four community development services to two organizations provided by two employees in an adjacent county outside the bank’s delineated AA. These employees served as board members and provided financial expertise to set up a food pantry in an LMI community and oversee fiscal matters associated with an LMI school district.

STATE OF WEST VIRGINIA

CRA RATING for State of West Virginia¹³: “Satisfactory”

The Lending Test is rated: “Satisfactory”

The Community Development Test is rated: “Satisfactory”

The major factors and criteria contributing to this rating include:

- The distribution of loans to borrowers reflects a reasonable penetration among individuals of different income levels (including LMI) and poor penetration among businesses of different sizes;
- The geographic distribution of loans reflects a reasonable dispersion throughout the AA;
- The bank’s community development performance demonstrates an adequate responsiveness to the community development needs of the AA, considering the bank’s capacity and the need and availability of such opportunities in the bank’s AA.

SCOPE OF EXAMINATION

A full-scope review was conducted for the Huntington-Ashland AA and a limited-scope review was conducted for the Nonmetropolitan West Virginia AA. The period and products evaluated for these AAs are consistent with the scope discussed in the Scope of Examination section of this report. Based on the total loan volume by number and dollar amounts available in this AA, HMDA loans received the greatest weight followed by consumer and small business loans, respectively.

DESCRIPTION OF INSTITUTION’S OPERATIONS IN THE STATE OF WEST VIRGINIA

Lending activity in West Virginia accounted for 26.6% of the Ohio Valley’s total lending activity. As of June 30, 2021, Ohio Valley ranked 34th among 68 insured institutions in West Virginia with a deposit market share of 0.5%. Deposits in West Virginia account for 21.1% of the bank’s total deposits.

¹³For institutions with branches in two or more states in a multistate metropolitan area, this statewide evaluation is adjusted and does not reflect performance in the parts of those states contained within the multistate metropolitan area. Refer to the multistate metropolitan area rating and discussion for the rating and evaluation of the institution’s performance in that area.

CONCLUSIONS WITH RESPECT TO PERFORMANCE TESTS IN THE STATE OF WEST VIRGINIA

LENDING TEST

Ohio Valley's performance relative to the lending test in West Virginia is rated "Satisfactory."

Borrower and Geographic Distribution

Overall, the distribution of loans to borrowers reflects a reasonable penetration among individuals of different income levels (including LMI) and poor penetration among businesses of different sizes; however, small business distribution did not receive much weight since gross annual revenue information was not available for a large percentage of these loans. The geographic distribution of loans is reasonable, with a significant level of lending gaps in the Huntington-Ashland AA.

COMMUNITY DEVELOPMENT TEST

Ohio Valley's performance relative to the community development test in West Virginia is rated "Satisfactory." The bank's community development performance demonstrates an adequate responsiveness to community development needs of its AAs in West Virginia through community development loans, qualified investments and donations, and community development services, considering Ohio Valley's capacity and the need and availability of such opportunities.

Community Development Loans

Ohio Valley originated a community development loan totaling \$770,230 in West Virginia in the Huntington-Ashland AA, representing 17.0% of the bank's total community development lending by dollar amount during the evaluation period. There were no community development loans originated in Nonmetropolitan West Virginia.

Community Developments Investments

Ohio Valley made \$32,940 in small dollar donations during the evaluation period (61.4% in the Huntington-Ashland AA and 38.6% in Nonmetropolitan West Virginia). Ohio Valley also had a prior period investment with a current book value worth approximately \$752,951. This investment benefited a broader regional area in the Huntington-Ashland MSA and was given consideration because the bank was responsive to credit needs in the AA.

Qualified investments and donations in West Virginia represent 12.5% of the bank's total qualified investments and donations by dollar amount made during the evaluation period.

Community Development Services

The largest concentration of community development services was in Nonmetropolitan West Virginia, accounting for 78.0% of total services in West Virginia; the remaining 22.0% of services were in the Huntington-Ashland AA. Community development services in West Virginia represent 27.0% of the bank's total community development services provided during the evaluation period.

METROPOLITAN AREA
(Full-Scope Review)

**DESCRIPTION OF INSTITUTION'S OPERATIONS IN
HUNTINGTON-ASHLAND WV-KY-OH MSA #26580**

The Huntington-Ashland AA consists of the entirety of Cabell County, West Virginia and excludes Putnam and Wayne counties in West Virginia; Boyd, Carter, and Greenup counties in Kentucky; and Lawrence County in Ohio.¹⁴ Cabell County is in southwestern West Virginia along the Ohio River in the Appalachian Region of West Virginia. See Appendix A for an AA map and Appendix B for additional demographic data.

- Huntington-Ashland AA has not changed since the previous evaluation.
- The AA consists of 29 total tracts, comprised of five low-, six moderate-, 10 middle-, seven upper-, and one unknown-income tracts. There were no changes to the census tract designations during this evaluation period.
- As of June 30, 2021, the FDIC's Deposit Market Share Report, ranks Ohio Valley 11th among 14 institutions operating in the AA with a 2.7% market share. Truist Bank holds the largest market share with 19.6%, followed by JPMorgan Chase Bank with 18.4% market share. This leaves a residual 62.0% market share area available to the remaining twelve financial institutions, including Ohio Valley, in the AA. Ohio Valley ranks 21st among 27 institutions in the Huntington-Ashland MSA with a 1.1% market share. Ohio Valley has a small market share in this competitive market comprised of large national and regional banks and community banks. Deposits in the Huntington-Ashland AA account for 7.9% of Ohio Valley's total deposits.
- The 2020 HMDA Peer Market data indicates that Ohio Valley ranks ninth out of 129 HMDA reporters in the AA and originated 98 loans. City National Bank of West Virginia ranked first with 178 originated loans.
- Ohio Valley operates two branches with full-service ATMs and 6 cash-only ATMs in the MSA.
- In Cabell County the bank has two branches with ATMs and two cash-only ATMs in Barboursville and Milton and a cash-only ATM in Huntington in middle-income tracts. There is also a cash-only ATM in Huntington in a moderate-income tract. The bank has two cash-only ATMs in Winfield and Hurricane in upper-income tracts in Putnam County.
- The cash-only ATMs are in drug stores or gas stations.
- The bank did not open or close any branches in this AA since the previous evaluation.

¹⁴ The bank has no branches or deposit-taking ATMs in Kentucky or Ohio.

Community Contact

An interview was conducted with a community contact to provide additional information regarding the AA. The contact was with a representative from economic development organization. The contact explained that multiple community partners are working on a business resilience initiative to attract millions of federal dollars to build a network of entrepreneurs interested in economic diversification, climate resiliency and green technologies. This initiative is anticipated to create hundreds of new jobs and more than 500 new and/or expanding businesses. Other initiatives will include technical services to revitalize historic downtown areas and buildings, including but not limited to preparing environmental and structural assessments to determine the kinds of infrastructure and renovations needed. Modern infrastructure is key to helping communities diversify and grow their economies. The contact stated there are opportunities for banks to fund infrastructure projects, provide small and large dollar funding to start-ups and existing businesses, and provide entrepreneur training. The contact believes that local area banks are engaged and responsive to the business community.

Population Characteristics

Population Change			
Assessment Area: Huntington-Ashland, WV-KY-OH MSA #26580			
Area	2015 Population	2020 Population	Percent Change
Cabell County, West Virginia	96,824	91,589	-5.4
Huntington-Ashland, WV-KY-OH MSA #26580	369,466	354,085	-4.2
West Virginia	1,851,420	1,784,787	-3.6
<i>Source: 2011-2015 U.S. Census Bureau: American Community Survey U.S. Census Bureau Vintage 2020 Population Estimates for the United States and States</i>			

- The AA experienced a 5.4% decline in population between 2015 and 2020.
- 80.1% of the AA population was 18 years of age or older, the legal age to enter into a contract.
- 16.6% of the population in the AA was age 65 and over, compared to 17.3% in West Virginia.
- Both the AA and state population is aging and decreasing resulting in a shrinking working population or lack of labor supply and increasing demand for leisure and healthcare services.
- 12.2% of the AA's population resides in low-income tracts compared to 12.4% that reside in moderate-income tracts.
- According to 2020 U.S. Census data, Huntington is the largest city in the AA with a population of 46,842, representing a 5.0% decline since 2010. Conversely, the municipalities of Barboursville and Milton have populations of 4,268 and 2,586, representing an increase of 7.7% and 6.7%, respectively since 2010.

Income Characteristics

Borrower Income Levels														
Assessment Area: Huntington-Ashland, WV-KY-OH MSA #26580														
FFIEC Estimated Median Family Income			Low			Moderate			Middle		Upper			
Year	\$	% Change	0	-	49.9%	50%	-	79.9%	80%	-	119.9%	120%	-	& above
2018	\$56,900		0	-	\$28,449	\$28,450	-	\$45,519	\$45,520	-	\$68,279	\$68,280	-	& above
2019	\$58,800	3.3	0	-	\$29,399	\$29,400	-	\$47,039	\$47,040	-	\$70,559	\$70,560	-	& above
2020	\$60,500	2.9	0	-	\$30,249	\$30,250	-	\$48,399	\$48,400	-	\$72,599	\$72,600	-	& above
2021	\$61,000	0.8	0	-	\$30,499	\$30,500	-	\$48,799	\$48,800	-	\$73,199	\$73,200	-	& above

Source: 2018-2021 FFIEC Census Data

- The median family income (MFI) in the AA increased each year during the evaluation period; overall, MFI increased a significant 7.0% during this timeframe, reflecting economic expansion.
- According to the U.S. Census data estimates, the 2015 MFI in the AA (\$54,008) is 2.2% larger than the MFI in West Virginia (\$52,866).

Poverty Rates			
Assessment Area: Huntington-Ashland, WV-KY-OH MSA #26580			
Area	2018	2019	2020
Cabell County, West Virginia	19.3	18.5	19.9
West Virginia	17.4	16.2	15.8
United States	13.1	12.3	11.9

Source: U.S. Census Bureau Small Area Income and Poverty Estimates Program

- Poverty rates across the AA were considerably higher than the poverty rates in West Virginia and the United States during the evaluation period. In 2020, the AA poverty rate was 19.9% which was 4.1 and 8.0 percentage points higher than West Virginia's or the nation's poverty rates, respectively.
- Of the 23,048 families in the AA, 39.7% are designated as LMI with 15.0% living below the poverty level and are higher than West Virginia's.
- Of the 39,973 households in the AA, 22.4% are below the poverty level and 2.5% receive public assistance.

Housing Characteristics

Housing Cost Change										
Assessment Area: Huntington-Ashland, WV-KY-OH MSA #26580										
Area	Median Housing Value					Median Gross Rent				
	2010	2015	Percent Change - 2010 to 2015	2019	Percent Change - 2015 to 2019	2010	2015	Percent Change - 2010 to 2015	2019	Percent Change - 2015 to 2019
Cabell County, West Virginia	\$97,500	\$112,800	15.7	\$124,500	10.4	\$590	\$653	10.7	\$748	14.5
West Virginia	\$94,500	\$103,800	9.8	\$119,600	15.2	\$549	\$643	17.1	\$725	12.8
<small>Source: 2006-2010 U.S. Census Bureau: American Community Survey 2011-2015 U.S. Census Bureau: American Community Survey 2015-2019 U.S. Census Bureau: American Community Survey</small>										

- Median housing values in the AA increased from 2010-2019. Median home prices increased more than MFI during the evaluation period, making housing less affordable across the AA during this period.
- Median gross rents in the AA increased from 2010-2019. The rise in median gross rents indicates the need for more affordable housing, and 28.5% of all renters in the AA have rental costs that are at least 30% of their income.
- There are 46,376 housing units in the AA, of which 52.7% are owner occupied, 33.5% are rental, and 13.8% are vacant. In low-income tracts, 25.6% are owner-occupied, 52.3% are rental, and 22.1% are vacant. In moderate-income tracts, 38.4% are owner-occupied, 43.7% are rental, and 18.0% are vacant. In low-income tracts, 74.4% of housing units are either rental or vacant. In moderate-income tracts, 61.7% of housing units are either rental or vacant.
- With 47.3% of housing units being either rental or vacant across the AA, there may be limited opportunities to originate HMDA loans, particularly in LMI tracts.
- The median age of housing stock in the AA is 56 years old, and 31.6% of housing units were built prior to 1950. The age of the housing stock across the AA demonstrates a potential need for home improvement lending.

Housing Cost Burden						
Assessment Area: Huntington-Ashland, WV-KY-OH MSA #26580						
Area	Cost Burden – Owners			Cost Burden – Renters		
	Low Income	Moderate Income	All Owners	Low Income	Moderate Income	All Renters
Cabell County, West Virginia	49%	27%	16%	67%	51%	45%
Huntington-Ashland, WV-KY-OH MSA #26580	51%	22%	16%	66%	39%	39%
West Virginia	46%	19%	14%	63%	33%	37%

Cost Burden is housing cost that equals 30 percent or more of household income
Source: U.S. Department of Housing and Urban Development (HUD), 2013-2017 Comprehensive Housing Affordability Strategy

- Within the AA, 49.0% of low-income homeowners are cost-burdened, defined as having housing costs on average that are 30.0% or more of household income. In contrast, within the AA, only 27.0% of moderate-income homeowners are cost-burdened.
- This trend applies across West Virginia, where low-income homeowners are cost-burdened on average more than moderate-income homeowners.
- Within the AA, 67.0% of low-income renters are cost-burdened, which is more than renters across West Virginia (63.0%). Moderate-income renters are also cost-burdened more in the AA than in West Virginia.
- The data shows that cost burden disproportionately affects low-income home purchasers and renters.
- Cost-burdened renters may have a difficult time saving enough monies to make a sufficient down payment to purchase a home or otherwise afford increasing rents.

Labor, Employment and Economic Characteristics

- As of fiscal year 2021, Cabell County’s economy was classified as transitional. According to the ARC’s economic classification system for Appalachian counties,¹⁵ transitional counties are those transitioning between strong and weak economies and rank as ARC’s largest economic classification category.
- Cabell County has been significantly impacted by the opioid epidemic. As stated earlier, recent Federal Reserve Bank of Cleveland research suggests that counties that have higher levels of opioid prescriptions have substantially lower prime-age labor force participation rates and reduced labor market activity, which ultimately impacts economic growth potential of a local area.
- According to West Virginia Economic Development:¹⁶
 - Cabell County is most impacted by the industries of healthcare and social services,

¹⁵ ARC: <https://www.arc.gov/about-the-appalachian-region/>

¹⁶ westvirginia.gov/interactive-data/community-profile/

- education, retail, and accommodation and food services
- Most businesses in Cabell County have 1 to 4 employees (56.6%)
- There are 67.0% more households who own their homes than there are renters
- The average weekly wage based on median household income is \$828, which indicates that employed persons could afford the median rent of \$748.
- According to WorkForce West Virginia,¹⁷ the top 10 employers in Cabell County are:
 - Mountain Health Network, Marshall University, Cabell County Board of Education, Marshall Health, Wal-Mart Stores, Huntington Alloys Corporation, Alcon Research, LLC, AT&T Customer Services, Inc., Steel of West Virginia, Inc., and United States Department of Defense.

Unemployment Rates					
Assessment Area: Huntington-Ashland, WV-KY-OH MSA #26580					
Area	2016	2017	2018	2019	2020
Cabell County, West Virginia	4.8%	4.6%	4.7%	4.2%	8.0%
Huntington-Ashland, WV-KY-OH MSA #26580	6.4%	5.8%	5.6%	5.1%	8.2%
West Virginia	6.1%	5.2%	5.2%	4.9%	8.3%

Source: Bureau of Labor Statistics: Local Area Unemployment Statistics

- While 2016-2019 unemployment rates decreased across the AA, 2020 unemployment rates increased substantially in response to the COVID-19 pandemic. The average unemployment rate for the AA increased from 4.2% in 2019 to 8.0% in 2020.
- The unemployment rates across the AA were slightly below the unemployment rates in West Virginia during this period.

¹⁷ mi.workforcewv.org/EandWAnnual/TopEmployers.html

CONCLUSIONS WITH RESPECT TO PERFORMANCE TESTS IN HUNTINGTON-ASHLAND WV-KY-OH MSA #26580

LENDING TEST

The lending test performance in the Huntington-Ashland MSA is rated "Satisfactory." Details of Ohio Valley's lending can be found in the tables in Appendix D.

Lending to Borrowers of Different Income Levels and Businesses of Different Sizes

Ohio Valley's lending penetration among borrowers of different income (including LMI) levels in the Huntington-Ashland MSA is considered reasonable.

HMDA Lending

Ohio Valley's performance was compared to the percentage of families (proxy) and the aggregate of all lenders. Ohio Valley's borrower distribution of HMDA loans is reasonable, considering the high poverty levels. During the evaluation period, Ohio Valley originated 175 HMDA loans, totaling \$38.9 million. See Appendix D for explicit HMDA-reportable lending data.

HMDA Lending (combined)

In 2021 Ohio Valley originated 24 HMDA loans totaling \$8.5 million. Ohio Valley made 24 HMDA loans to borrowers with unknown-income designations. Ohio Valley made no HMDA loans to low-income borrowers, compared to the percentage of families at 24.0%. Ohio Valley made three (12.5%) HMDA loans to moderate-income borrowers, which was below the percentage of families at 15.7%.

In 2019 Ohio Valley originated 40 HMDA loans totaling \$8.1 million. Ohio Valley made four HMDA loans to borrowers with unknown-income designations. Ohio Valley made no HMDA loans to low-income borrowers, compared to the percentage of families at 24.0% and the aggregate of all lenders at 6.3%. Ohio Valley made six (15.0%) HMDA loans to moderate-income borrowers, which was comparable to the percentage of families at 15.7% and the aggregate of all lenders at 15.2%.

In 2018 Ohio Valley originated 18 HMDA loans totaling \$3.3 million. Ohio Valley made one HMDA loan to a borrower with an unknown-income designation. Ohio Valley made one (5.6%) HMDA loan to a low-income borrower, which was well below the percentage of families at 24.2% and below the aggregate of all lenders at 6.7%. Ohio Valley made one (5.6%) HMDA loan to a moderate-income borrower, which was well below the percentage of families at 15.9% and the aggregate of all lenders at 14.9%.

Considering the bank's performance relative to proxy and the aggregate of all lenders, the

borrower distribution of HMDA loans to low-income borrowers is poor and reasonable to moderate-income borrowers, especially considering the high poverty levels.

Home Purchase Lending

In 2020 Ohio Valley originated 40 home purchase loans totaling \$8.9 million. Ohio Valley made three (7.5%) home purchase loans to borrowers with unknown-income designations. Ohio Valley made two (5.0%) home purchase loans to low-income borrowers, which was significantly below the percentage of families at 24.0% and below the aggregate of all lenders at 8.4%. Ohio Valley made four (10.0%) home purchase loans to moderate-income borrowers, which was below the percentage of families at 22.0% and the aggregate of all lenders at 15.7%.

Ohio Valley's performance mostly fell below proxy and the aggregate of all lenders; therefore, the borrower distribution of home purchase loans to LMI borrowers is reasonable.

Refinance Lending

In 2020 Ohio Valley originated 53 refinance loans totaling \$10.1 million. Ohio Valley made two (3.8%) refinance loans to borrowers with unknown-income designations. Ohio Valley made no refinance loans to low-income borrowers, compared to the percentage of families at 24.0% and the aggregate of all lenders at 3.6%. Ohio Valley made four (7.5%) refinance loans to moderate-income borrowers, which was below the percentage of families at 15.7% and the aggregate of all lenders at 9.9%.

Ohio Valley's performance fell well below proxy and the aggregate of all lenders; therefore, the borrower distribution of refinance loans to low-income borrowers is poor and reasonable to moderate-income borrowers.

Consumer Lending

Ohio Valley's performance was compared to the percentage of households by household income (proxy). During the evaluation period, Ohio Valley originated 119 consumer loans totaling \$2.6 million, and only 10 (8.4%) consumer loans were made to borrowers with unknown-income designations. Overall, Ohio Valley's borrower distribution of consumer loans is reasonable.

Distribution of July 1, 2020-June 30, 2021 Consumer Loans by Borrower Income Level Assessment Area: Huntington-Ashland, WV-KY-OH MSA #26580					
Borrower Income Level	Bank Loans				Households by Household Income %
	#	#%	\$(000)	\$%	
Motor Vehicle Loans					
Low	3	6.4	35	4.1	31.2
Moderate	12	25.5	148	17.5	14.8
Middle	7	14.9	133	15.8	15.1
Upper	18	38.3	366	43.4	39.0
Unknown	7	14.9	163	19.3	0.0
Total	47	100.0	844	100.0	100.0
Other – Secured Loans					
Low	3	8.8	47	4.6	31.2
Moderate	7	20.6	102	9.9	14.8
Middle	6	17.6	101	9.8	15.1
Upper	17	50.0	775	75.2	39.0
Unknown	1	2.9	6	0.6	0.0
Total	34	100.0	1,031	100.0	100.0
Other – Unsecured Loans					
Low	4	10.5	18	2.6	31.2
Moderate	11	28.9	78	11.2	14.8
Middle	7	18.4	43	6.2	15.1
Upper	14	36.8	546	78.6	39.0
Unknown	2	5.3	10	1.4	0.0
Total	38	100.0	695	100.0	100.0
Total Consumer Loans					
Low	10	8.4	100	3.9	31.2
Moderate	30	25.2	328	12.8	14.8
Middle	20	16.8	277	10.8	15.1
Upper	49	41.2	1,687	65.6	39.0
Unknown	10	8.4	179	7.0	0.0
Total	119	100.0	2,570	100.0	100.0
Source: 2020 and 2021 FFIEC Census Data 2011-2015 U.S. Census Bureau: American Community Survey					
Note: Percentages may not total 100.0 percent due to rounding.					

Motor Vehicle Lending

Ohio Valley originated 47 motor vehicle loans totaling \$844,000. Ohio Valley originated three (6.4%) of motor vehicle loans to low-income borrowers, which was significantly below the percentage of households at 31.2%. Ohio Valley made 12 (25.5%) motor vehicle loans to moderate-income borrowers, which exceeded the percentage of households at 14.8%.

Considering the bank's performance relative to proxy, the borrower distribution of motor vehicle loans to low-income borrowers is very poor and excellent to moderate-income borrowers, especially considering that access to transportation is essential for improving upward social mobility for lower-income individuals and communities.

Other Secured Lending

Ohio Valley originated 34 other secured consumer loans totaling \$1.0 million. Ohio Valley originated three (8.8%) other secured consumer loans to low-income borrowers, which was below the percentage of households at 31.2%. Ohio Valley made seven (20.6%) other secured loans to moderate-income borrowers, which exceeded the percentage of households at 14.8%.

Considering the bank's performance relative to proxy, the borrower distribution of other secured loans to low-income borrowers is reasonable and excellent to moderate-income borrowers.

Other Unsecured Lending

Ohio Valley originated 38 unsecured consumer loans totaling \$695,000. Ohio Valley made four (10.5%) other unsecured consumer loans to low-income borrowers, which was below the percentage of households at 31.2%. Ohio Valley made 11 (28.9%) other unsecured consumer loans to moderate-income borrowers, which exceeded the percentage of households at 14.8%.

Considering the bank's performance relative to proxy, the borrower distribution of other unsecured loans to low-income borrowers is reasonable and excellent to moderate-income borrowers, especially considering access to unsecured, small dollar loans gives LMI individuals the ability to have access to smaller amounts of money to pay for items/services they could not otherwise afford.

Small Business Lending

From January 1, 2020, through June 30, 2021, Ohio Valley originated 91 small business loans totaling \$19.3 million to businesses of different sizes and 65 (71.4%) were PPP loans. Of those loans, 81 (89.0%) totaling \$15.9 million were made to businesses with unknown gross annual revenues and 80.0% were PPP loans.

Distribution of January 1, 2020-June 30, 2021 Small Business Lending by Revenue Size of Businesses Assessment Area: Huntington-Ashland, WV-KY-OH MSA #26580					
	Bank Loans				Total Businesses %
	#	#%	\$(000)	%	
By Revenue					
\$1 Million or Less	9	9.9	2,932	15.2	88.4
Over \$1 Million	1	1.1	550	2.8	10.4
Revenue Unknown	81	89.0	15,858	82.0	1.1
Total	91	100.0	19,339	100.0	100.0
By Loan Size					
\$100,000 or Less	54	59.3	1,779	9.2	
\$100,001 - \$250,000	17	18.7	2,848	14.7	
\$250,001 - \$1 Million	16	17.6	7,322	37.9	
Total	91	100.0	19,339	100.0	
By Loan Size and Revenue \$1 Million or Less					
\$100,000 or Less	5	55.6	322	11.0	
\$100,001 - \$250,000	1	11.1	142	4.8	
\$250,001 - \$1 Million	2	22.2	1,368	46.7	
Total	9	100.0	2,932	100.0	
<i>Source: 2020 and 2021 FFIEC Census Data 2020 Dun & Bradstreet Data 2011-2015 U.S. Census Bureau: American Community Survey</i>					
<i>Note: Percentages may not total 100.0 percent due to rounding.</i>					

Ohio Valley made nine (9.9%) loans totaling \$2.9 million to businesses with revenues of \$1.0 million or less compared to the percentage of small businesses in the AA at 88.4%. If PPP loans had been excluded from this analysis, 34.6% of the bank’s loans were made to businesses with revenues of \$1.0 million or less, which is a poor distribution; however, 61.5% of non-PPP loans were made to businesses with unknown revenues.

While the small business distribution is poor, this analysis is skewed by the large number of businesses with unknown gross annual revenues; however, Ohio Valley made 54 (59.3%) loans in amounts of \$100,000 or less. Ohio Valley’s willingness to lend in smaller amounts exhibits good responsiveness to credit needs of small businesses in the AA, particularly those impacted by the COVID-19 emergency. The community contact indicated there is a need for small dollar funding to start-ups and existing businesses.

Geographic Distribution of Loans

Ohio Valley’s geographic distribution reflects a reasonable dispersion of loans in the Huntington-Ashland AA. Ohio Valley has a significant level of lending gaps in the Huntington-Ashland AA.

Percentage of Lending Penetration				
Tract Income Level	2018	2019	2020	1/1/2021-6/30/2021
Low	0.0%	0.0%	100.0%	60.0%
Moderate	0.0%	50.0%	50.0%	50.0%
Middle	50.0%	80.0%	100.0%	80.0%
Upper	57.1%	57.1%	100.0%	85.7%
Unknown	0.0%	0.0%	100.0%	100.0%
Total	31.0%	51.7%	89.7%	72.4%

While Ohio Valley was able to originate loans in a majority of LMI tracts, particularly in 2020, the year with the most loans, challenges in lending in these tracts can be attributed to the relative distance from Ohio Valley’s branches. For example, Barbourville and Milton are at least 11 to 20 miles away from downtown Huntington. Ohio Valley also has a small market share and faces significant competition from several larger financial institutions in this market. Lastly, the penetration rate in middle-income tracts is noteworthy considering the persistent levels of poverty and unemployment in these distressed geographies. Except in 2018, Ohio Valley was able to make loans in a majority of tracts during the evaluation period. Ohio Valley only originated 18 HMDA loans in 2018.

Ohio Valley deferred 59 commercial, mortgage, consumer, and home equity loan payments in 2020 and 2021 due to the COVID-19 emergency in the Huntington-Ashland AA, representing 7.3% of total deferrals. Of these deferrals, approximately 2.0% were in low-income tracts and 83.0% were in distressed middle-income tracts. These deferrals are considered responsive to serving credit needs of low- and distressed middle-income areas and small businesses impacted by the COVID-19 emergency.

HMDA Lending

During the evaluation period Ohio Valley made 175 HMDA loans, totaling \$38.9 million. Ohio Valley’s performance was compared to the percentage of owner-occupied units (proxy) and the aggregate of all lenders. Ohio Valley’s geographic distribution of HMDA loans is reasonable, especially considering limited opportunities to originate mortgage loans in LMI tracts which have a very high percentage of rental and vacant units.

HMDA Lending (combined)

In 2021 Ohio Valley originated 24 HMDA loans totaling \$8.5 million. Ohio Valley made one (4.2%) HMDA loan in a low-income tract, which was below the percentage of owner-occupied units in these tracts at 7.3%. Ohio Valley made one (4.2%) HMDA loan in a moderate-income tract, which was below the percentage of owner-occupied units in these tracts at 9.5%.

In 2019 Ohio Valley originated 40 HMDA loans totaling \$8.1 million. Ohio Valley made no HMDA loans in low-income tracts, compared to the percentage of owner-occupied units in these tracts at 7.2% and the aggregate of all lenders at 3.7%. Ohio Valley made three (7.5%) HMDA loans in moderate-income tracts, which was below the percentage of owner-occupied units in these tracts at 9.5% and exceeded the aggregate of all lenders at 4.8%.

In 2018 Ohio Valley originated 18 HMDA loans totaling \$3.3 million. Ohio Valley made no HMDA loans in low-income tracts, compared to the percentage of owner-occupied units in these tracts at 7.3% and the aggregate of all lenders at 5.0%. Ohio Valley made no HMDA loans in moderate-income tracts, compared to the percentage of owner-occupied units in these tracts at 9.5% and the aggregate of all lenders at 6.0%.

Overall, Ohio Valley's lending of HMDA loans fell below proxy and the aggregate of all lenders in LMI tracts. Therefore, Ohio Valley's HMDA lending in LMI tracts is reasonable.

Home Purchase Lending

In 2020 Ohio Valley originated 40 home purchase loans totaling \$8.9 million. Ohio Valley made two (5.0%) home purchase loans in low-income tracts, which was below the percentage of owner-occupied units in these tracts at 7.3% but exceeded the aggregate of all lenders at 4.2%. Ohio Valley made no home purchase loans in moderate-income tracts, compared to the percentage of owner-occupied units in these tracts at 9.5% and the aggregate of all lenders at 6.1%. Therefore, Ohio Valley's home purchase lending in the low-income tracts is reasonable and very poor in moderate-income tracts.

Refinance Lending

In 2020 Ohio Valley originated 53 refinance loans totaling \$10.1 million. Ohio Valley made one (1.9%) refinance loan in a low-income tract, which was below the percentage of owner-occupied units in these tracts at 7.3% and comparable to the aggregate of all lenders at 2.0%. Ohio Valley made no refinance loans in moderate-income tracts, compared to the percentage of owner-occupied units in these tracts at 9.5% and the aggregate of all lenders at 3.4%. Therefore, Ohio Valley's refinance lending in the low-income tracts is reasonable and very poor in moderate-income tracts.

Consumer Lending

Ohio Valley's performance was compared to the percentage of households by census tract (proxy). During the evaluation period, Ohio Valley originated 119 consumer loans totaling \$2.6 million. Overall, Ohio Valley's borrower distribution of consumer loans is poor; however, this is not a major market for Ohio Valley, and there is significant competition from large national and regional financial institutions.

Distribution of July 1, 2020-June 30, 2021 Consumer Loans by Income Level of Geography Assessment Area: Huntington-Ashland, WV-KY-OH MSA #26580					
Geographic Income Level	Bank Loans				Households %
	#	#%	\$(000)	%	
Motor Vehicle Loans					
Low	1	2.1	16	1.9	13.5
Moderate	4	8.5	34	4.0	12.4
Middle	35	74.5	671	79.5	47.0
Upper	6	12.8	118	14.0	25.8
Total	47	100.0	844	100.0	100.0
Other - Secured Loans					
Low	3	8.8	34	3.3	13.5
Moderate	1	2.9	11	1.1	12.4
Middle	26	76.5	777	75.4	47.0
Upper	4	11.8	210	20.4	25.8
Total	34	100.0	1,031	100.0	100.0
Other - Unsecured Loans					
Low	1	2.6	60	8.6	13.5
Moderate	1	2.6	4	0.6	12.4
Middle	32	84.2	602	86.6	47.0
Upper	4	10.5	28	4.0	25.8
Total	38	100.0	695	100.0	100.0
Total Consumer Loans					
Low	5	4.2	110	4.3	13.5
Moderate	6	5.0	49	1.9	12.4
Middle	93	78.2	2,050	79.8	47.0
Upper	14	11.8	356	13.9	25.8
Total	119	100.0	2,570	100.0	100.0
Source: 2020 and 2021 FFIEC Census Data 2011-2015 U.S. Census Bureau: American Community Survey					
Note: Percentages may not total 100.0 percent due to rounding.					

Motor Vehicle Lending

Ohio Valley originated 47 motor vehicle loans, totaling \$844,000. Ohio Valley made one (2.1%) motor vehicle loan in a low-income tract which was significantly below the percentage of households at 13.5%. The bank made four (8.5%) motor vehicle loans in moderate-income tracts which was below the percentage of households at 12.4%.

Ohio Valley's lending of motor vehicle loans was significantly below proxy in the low-income tracts and below proxy in the moderate-income tracts. Therefore, Ohio Valley's motor vehicle lending in low-income tracts is very poor and reasonable in moderate-income tracts.

Other Unsecured Lending

Ohio Valley originated 38 other unsecured loans, totaling \$695,000. Ohio Valley made one (2.6%)

other unsecured loan in a low-income tract which was significantly below the percentage of households at 13.5%. The bank made one (2.6%) other unsecured loan in a moderate-income tract which was significantly below the percentage of households at 12.4%.

Ohio Valley’s lending of other unsecured loans fell significantly below proxy in the low-income and moderate-income tracts. Therefore, Ohio Valley’s other unsecured lending in the low-income tracts and moderate-income tracts is very poor.

Other Secured Lending

Ohio Valley originated 34 other secured loans, totaling \$1.0 million. Ohio Valley made three (8.8%) other secured loans in low-income tracts which was below the percentage of households at 13.5%. The bank made one (2.9%) other secured loan in a moderate-income tract which was significantly below the percentage of households at 12.4%.

Ohio Valley’s lending of other secured loans fell below proxy in the low-income tracts and significantly below proxy in moderate-income tracts. Therefore, Ohio Valley’s other secured lending in low-income tracts is reasonable and very poor in moderate-income tracts.

Small Business Lending

From January 1, 2020 through June 30, 2021, Ohio Valley originated 91 small business loans totaling \$19.3 million. Ohio Valley made eight (8.8%) small business loans in low-income tracts, which was below the percentage of businesses in these tracts at 25.1%. Ohio Valley made no small business loans in moderate-income tracts, compared to the percentage of businesses in these tracts at 11.3%.

Distribution of January 1, 2020-June 30, 2021 Small Business Lending by Income Level of Geography Assessment Area: Huntington-Ashland, WV-KY-OH MSA #26580					
Geographic Income Level	Bank Loans				Total Businesses %
	#	#%	\$(000)	%	
Low	8	8.8	1,694	8.8	25.1
Moderate	0	0.0	0	0.0	11.3
Middle	59	64.8	8,846	45.7	42.3
Upper	24	26.4	8,799	45.5	20.1
Total	91	100.0	19,339	100.0	100.0
<small>Source: 2020 and 2021 FFIEC Census Data 2020 Dun & Bradstreet Data 2011-2015 U.S. Census Bureau: American Community Survey Note: Percentages may not total 100.0 percent due to rounding.</small>					

Therefore, Ohio Valley’s small business lending in LMI tracts is poor; however, this is not a major

market for Ohio Valley, and there is significant competition from large national and regional financial institutions.

COMMUNITY DEVELOPMENT TEST

Ohio Valley's community development performance demonstrates adequate responsiveness to community development needs of the Huntington-Ashland AA.

Community Development Lending

Ohio Valley originated a community development loan totaling \$770,230 during this evaluation period, representing 17.0% of total community development lending by dollar amount. This loan supported affordable housing and provided funding for the construction of a reuse store in a moderate-income area. Profits from the store will be used to support various aspects of affordable housing initiatives in the MSA, including but not limited to the bank's AA.

Community Development Investments

Ohio Valley had \$773,181 in qualified community development investments and donations during the evaluation period, representing 12.3% of total qualified investments by dollar amount. Ohio Valley made four small dollar donations totaling \$20,230 to a local children's hospital that provides comprehensive health care services to LMI children and families. Supporting healthcare to LMI individuals and families is considered responsive to community development needs in the AA.

Because the bank was responsive to credit needs in the AA, consideration was also given to a prior period investment through the FHLB Economic Development Advance Program, with a current book value worth approximately \$752,951. This investment benefited a small business in a broader regional area in the MSA.

Community Development Services

During the evaluation period, two employees provided four services to three organizations in the AA, accounting for 5.0% of total community development services. An employee provided financial literacy training to 100 LMI college students including but not limited to offering credit counseling and financial advice. The other employee taught safe banking to LMI seniors and banking basics to LMI students at the county career center.

NONMETROPOLITAN AREA
(Limited-scope Review)

DESCRIPTION OF INSTITUTION’S OPERATIONS IN WEST VIRGINIA

- **Nonmetropolitan West Virginia**
 - As of June 30, 2021, Ohio Valley operated two branches in the AA, representing 50.0% of its branches in West Virginia.
 - As of June 30, 2021, Ohio Valley had \$138.0 million in deposits in the AA, representing a market share of 32.2% and 62.6% of its statewide deposits.

CONCLUSIONS WITH RESPECT TO PERFORMANCE TESTS IN WEST VIRGINIA

Using available facts and data, including performance and demographic information, each AA’s performance was evaluated and compared with Ohio Valley’s performance in the state. The conclusions regarding performance are provided in the table below. Please refer to the tables in appendices for information regarding these areas.

Assessment Area	Lending Test	Community Development Test
Nonmetropolitan West Virginia	Consistent	Consistent

For the lending test, Ohio Valley received a “Satisfactory” rating in West Virginia. Performance in this limited-scope AA was consistent with Ohio Valley’s performance for the state. The borrower distribution is reasonable for HMDA and consumer loans, while the borrower distribution for small business loans is poor. However, the small business evaluation did not receive much weight due to the large number of businesses with unknown gross annual revenues. While there is no geographic distribution because this AA only consists of middle-income tracts, there were no conspicuous gaps in lending in the AA.

Ohio Valley deferred 123 loan payments due to the COVID-19 emergency in distressed middle-income tracts in Nonmetropolitan West Virginia, representing 15.2% of total deferrals.

Ohio Valley originated three Rent Buster loans in Nonmetropolitan West Virginia, representing 20.0% of total loans. These loans were in distressed middle-income tracts and made to LMI first-time homebuyers.

For the community development test, Ohio Valley received an “Satisfactory” rating in West Virginia. Community development was consistent with Ohio Valley’s performance for the state. The performance was primarily consistent due to the level of community development services, including but not limited to financial literacy training, relative to Ohio Valley’s operational presence in the AA.

The performance in the limited-scope AA did not change the overall state rating.

Appendix A – Scope of Examination Tables

Scope of Examination			
TIME PERIOD REVIEWED	Lending Test: January 1, 2018– June 30, 2021 Community Development Test: March 11, 2019 – February 28, 2022		
FINANCIAL INSTITUTION			PRODUCTS REVIEWED
The Ohio Valley Bank Company, Gallipolis, Ohio			HMDA – home purchase, refinance, home improvement, multi-family, other purpose closed-end Small Business HELOCs Consumer – motor vehicle, other unsecured, other secured
The Ohio Valley Bank Company has no affiliate relationships subject to examination.			

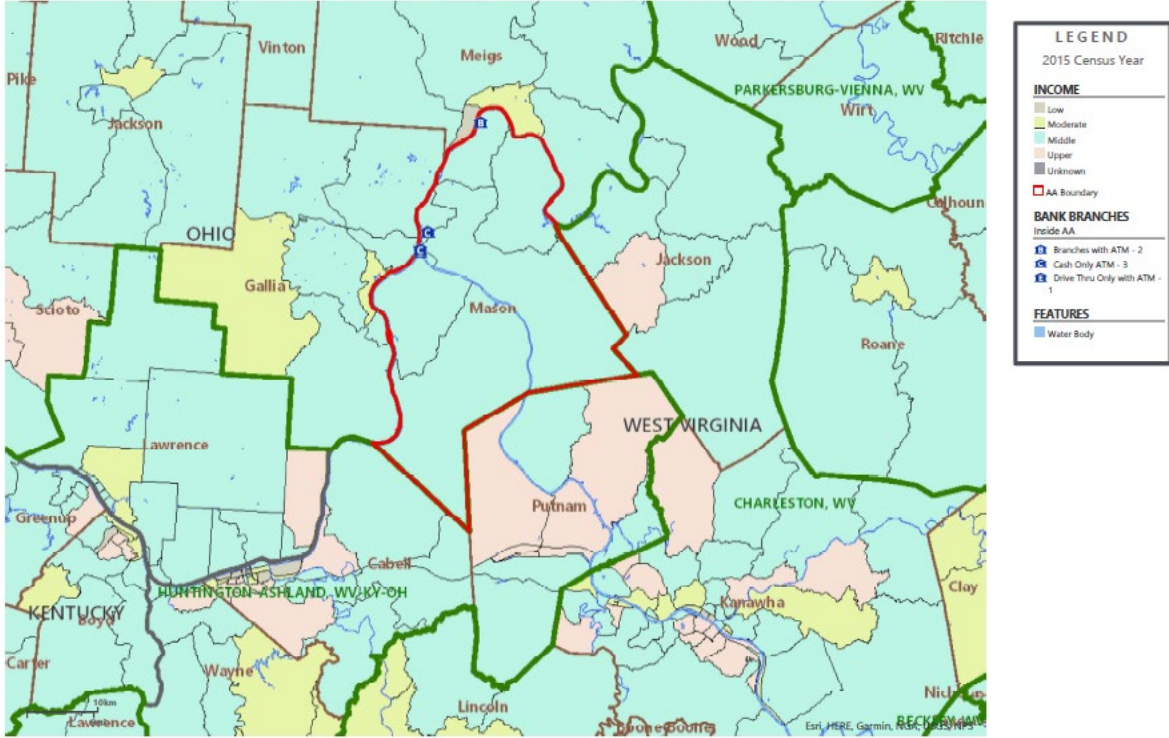
There is a statutory requirement that the written evaluation of a multistate institution’s performance must list the individual branches examined in each state.

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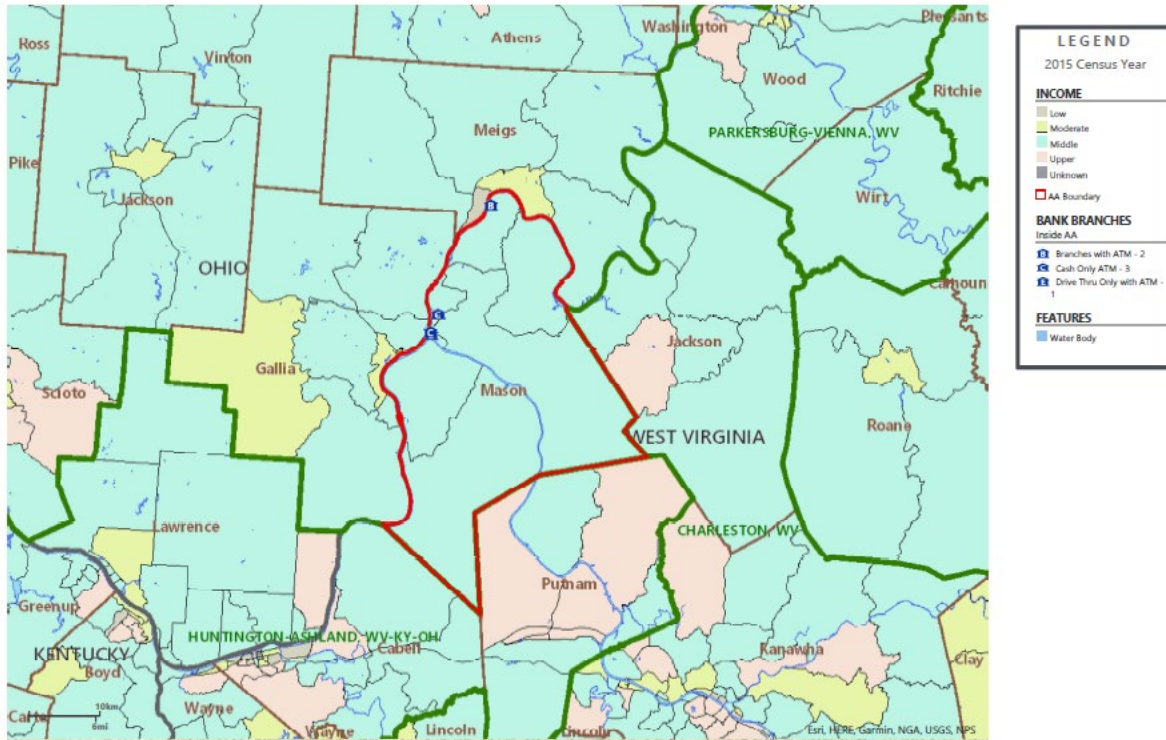
LIST OF ASSESSMENT AREAS AND TYPE OF EXAMINATION			
ASSESSMENT AREA	TYPE OF EXAMINATION	BRANCHES VISITED	OTHER INFORMATION
OHIO Nonmetropolitan Ohio	Full-scope review		
WEST VIRGINIA Huntington-Ashland WV-KY-OH MSA Nonmetropolitan West Virginia	Full-scope review Limited-scope review		.

Appendix B – Maps of Assessment Areas

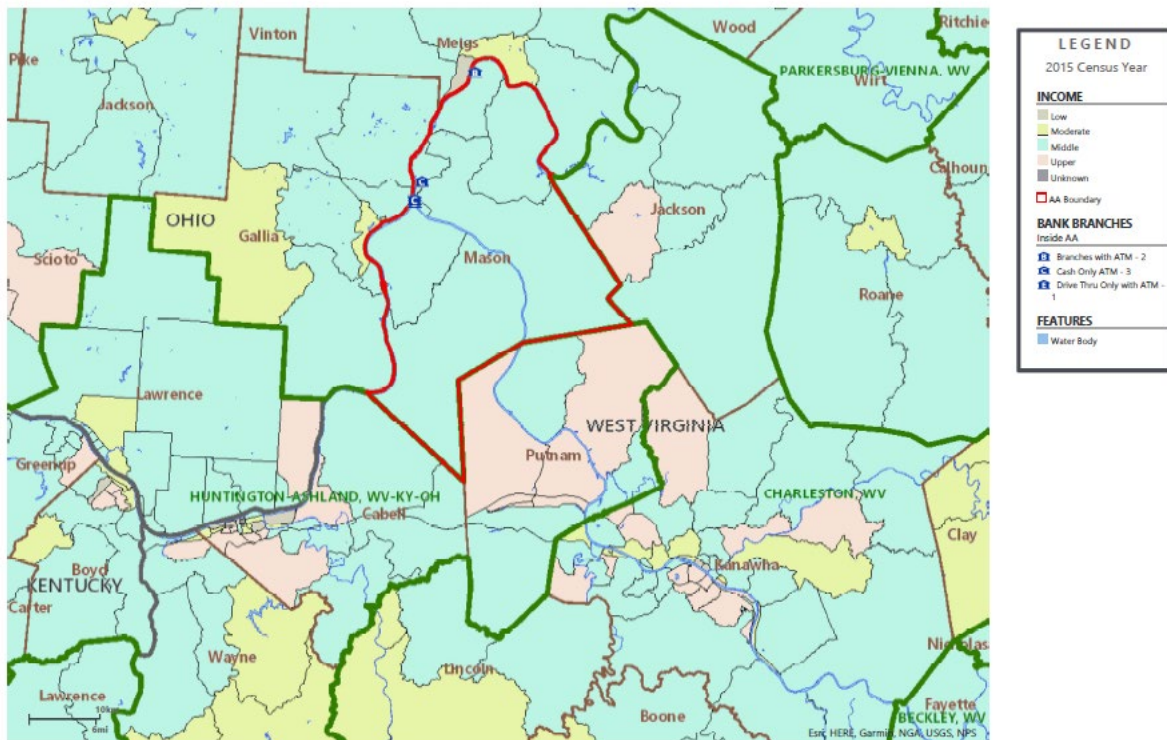
2021 Nonmetropolitan WV



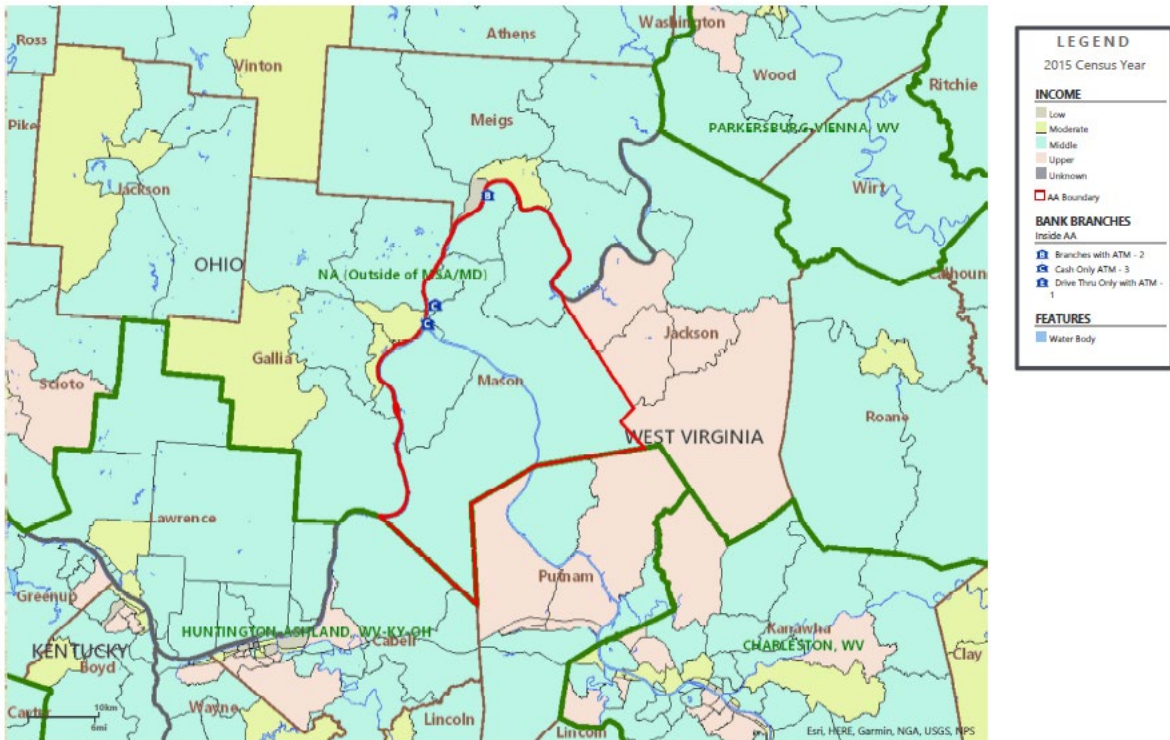
2020 Nonmetropolitan WV



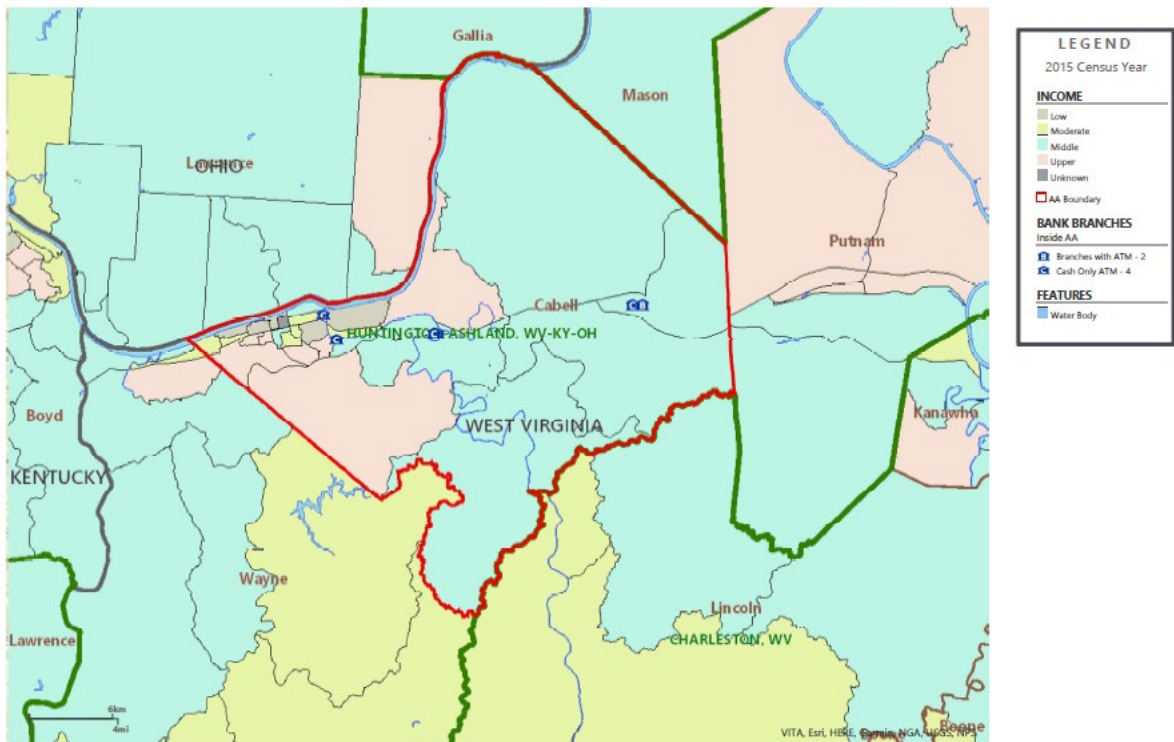
2019 Nonmetropolitan WV



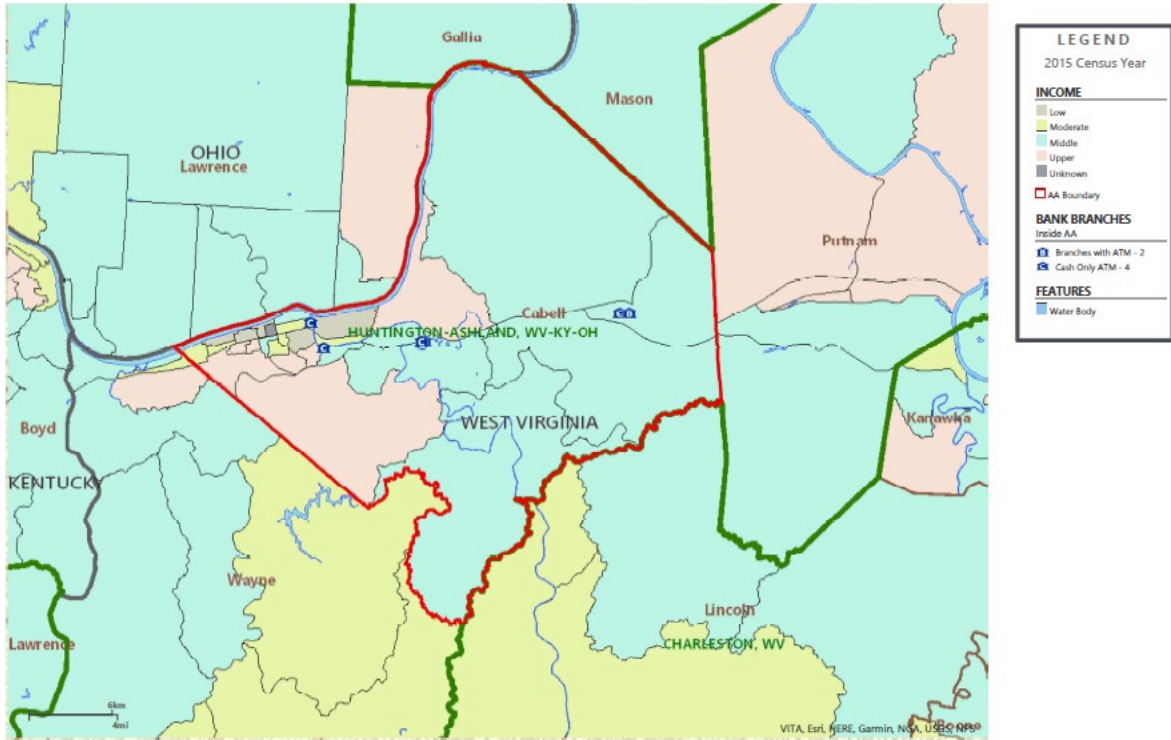
2018 Nonmetropolitan WV



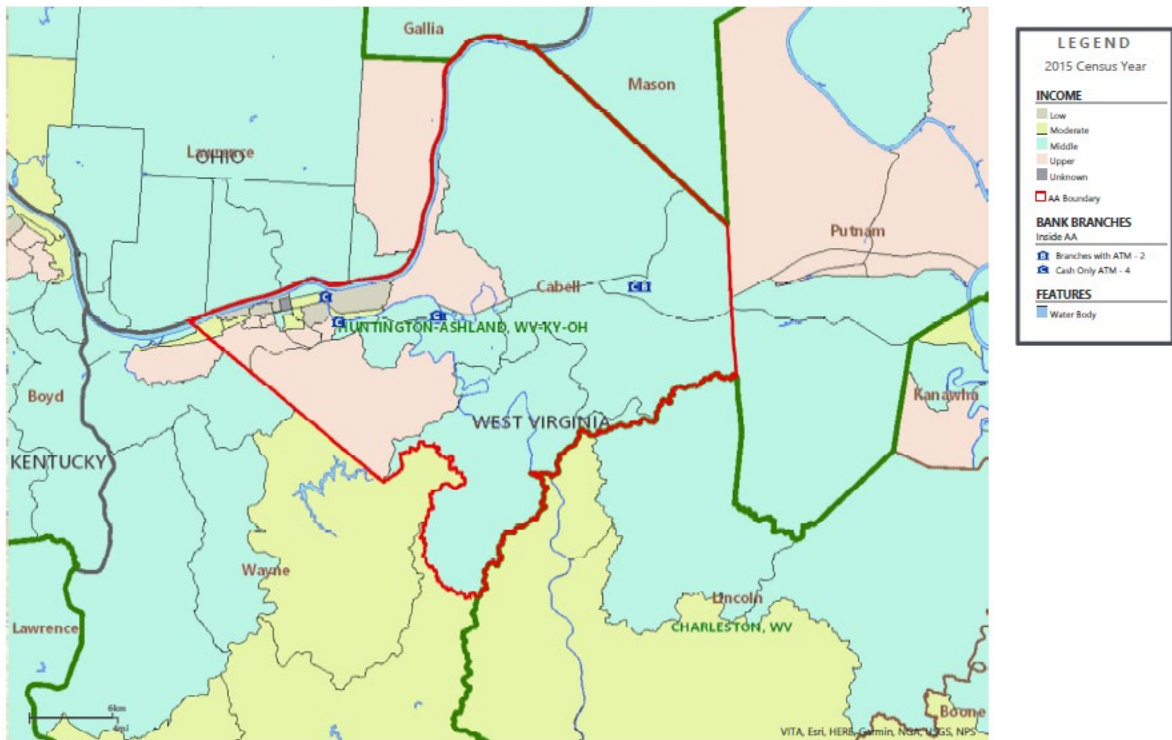
2021 Huntington-Ashland, WV MSA #26580



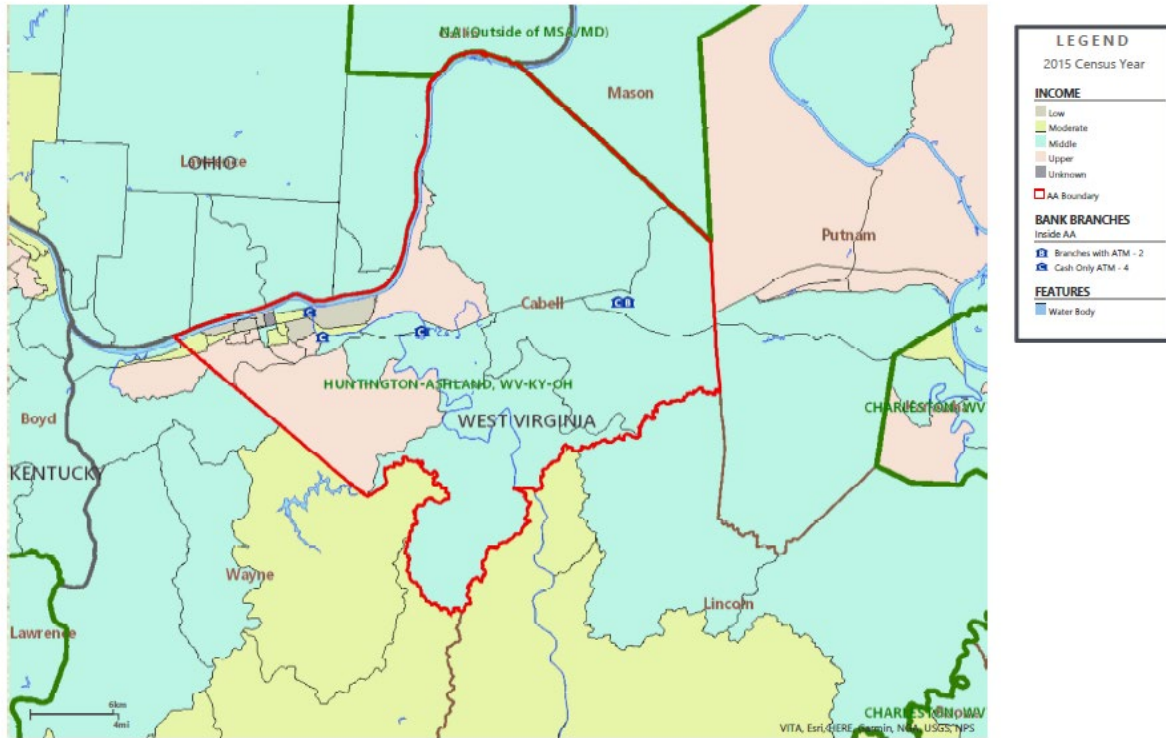
2020 Huntington-Ashland, WV MSA#26580



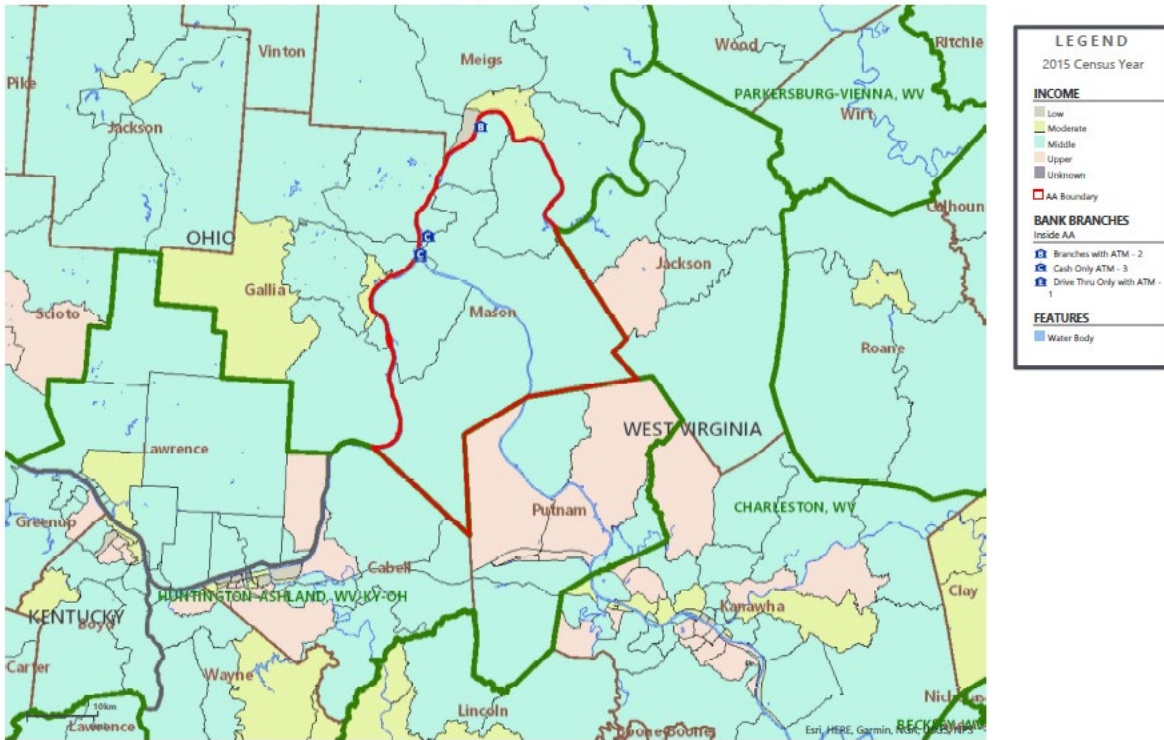
2019 Huntington-Ashland, WV MSA #26580



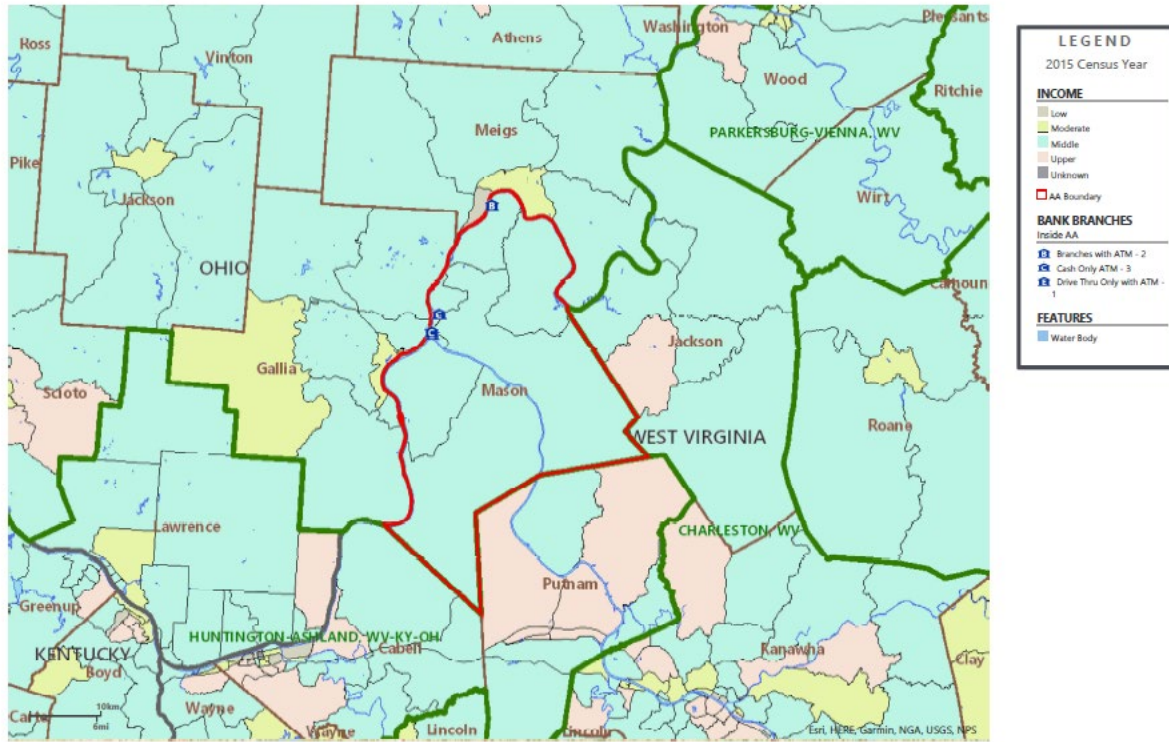
2018 Huntington-Ashland, WV MSA #26580



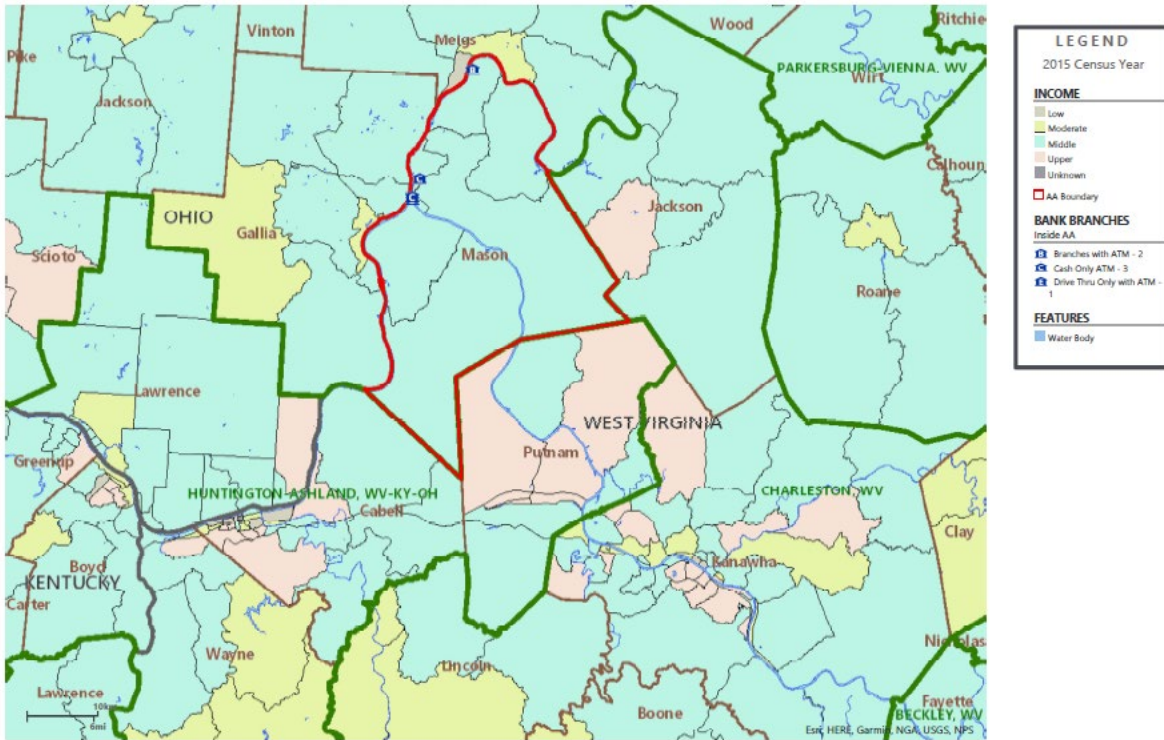
2021 Nonmetropolitan WV



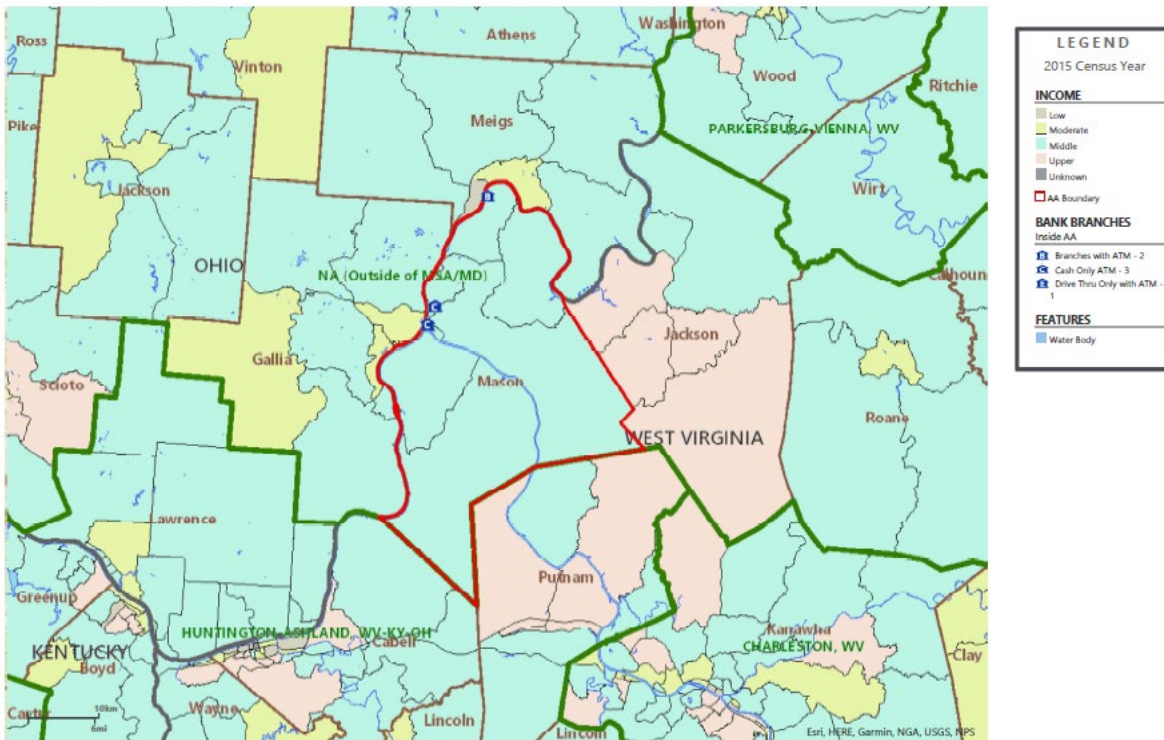
2020 Nonmetropolitan WV



2019 Nonmetropolitan WV



2018 Nonmetropolitan WV



Appendix C – Demographic Tables

2021 NONMETROPOLITAN OHIO AA DEMOGRAPHICS								
Income Categories	Tract Distribution		Families by Tract Income		Families < Poverty Level as % of Families by Tract		Families by Family Income	
	#	%	#	%	#	%	#	%
Low	1	3.4	776	2.3	275	35.4	9,405	27.7
Moderate	6	20.7	6,346	18.7	1,464	23.1	6,466	19.1
Middle	22	75.9	26,808	79.0	4,126	15.4	6,481	19.1
Upper	0	0.0	0	0.0	0	0.0	11,578	34.1
Unknown	0	0.0	0	0.0	0	0.0	0	0.0
Total AA	29	100.0	33,930	100.0	5,865	17.3	33,930	100.0
	Housing Units by Tract	Housing Type by Tract						
		Owner-occupied			Rental		Vacant	
		#	% by tract	% by unit	#	% by unit	#	% by unit
Low	1,746	772	2.1	44.2	553	31.7	421	24.1
Moderate	10,713	6,252	17.2	58.4	2,957	27.6	1,504	14.0
Middle	45,747	29,275	80.6	64.0	10,016	21.9	6,456	14.1
Upper	0	0	0.0	0.0	0	0.0	0	0.0
Unknown	0	0	0.0	0.0	0	0.0	0	0.0
Total AA	58,206	36,299	100.0	62.4	13,526	23.2	8,381	14.4
	Total Businesses by Tract	Businesses by Tract & Revenue Size						
		Less Than or = \$1 Million		Over \$1 Million		Revenue Not Reported		
		#	%	#	%	#	%	
Low	111	3.1	99	3.1	5	2.0	7	5.9
Moderate	777	21.7	692	21.5	59	23.6	26	22.0
Middle	2,698	75.2	2,427	75.4	186	74.4	85	72.0
Upper	0	0.0	0	0.0	0	0.0	0	0.0
Unknown	0	0.0	0	0.0	0	0.0	0	0.0
Total AA	3,586	100.0	3,218	100.0	250	100.0	118	100.0
Percentage of Total Businesses:			89.7		7.0		3.3	
	Total Farms by Tract	Farms by Tract & Revenue Size						
		Less Than or = \$1 Million		Over \$1 Million		Revenue Not Reported		
		#	%	#	%	#	%	
Low	1	0.4	1	0.4	0	0.0	0	0.0
Moderate	33	13.4	33	13.6	0	0.0	0	0.0
Middle	212	86.2	209	86.0	2	100.0	1	100.0
Upper	0	0.0	0	0.0	0	0.0	0	0.0
Unknown	0	0.0	0	0.0	0	0.0	0	0.0
Total AA	246	100.0	243	100.0	2	100.0	1	100.0
Percentage of Total Farms:			98.8		0.8		0.4	
Source: 2021 FFIEC Census Data 2021 Dun & Bradstreet Data 2011-2015 U.S. Census Bureau: American Community Survey Note: Percentages may not total 100.0 percent due to rounding.								

2020 NONMETROPOLITAN OHIO AA DEMOGRAPHICS								
Income Categories	Tract Distribution		Families by Tract Income		Families < Poverty Level as % of Families by Tract		Families by Family Income	
	#	%	#	%	#	%	#	%
Low	1	3.4	776	2.3	275	35.4	9,405	27.7
Moderate	6	20.7	6,346	18.7	1,464	23.1	6,466	19.1
Middle	22	75.9	26,808	79.0	4,126	15.4	6,481	19.1
Upper	0	0.0	0	0.0	0	0.0	11,578	34.1
Unknown	0	0.0	0	0.0	0	0.0	0	0.0
Total AA	29	100.0	33,930	100.0	5,865	17.3	33,930	100.0
	Housing Units by Tract	Housing Type by Tract						
		Owner-occupied			Rental		Vacant	
		#	% by tract	% by unit	#	% by unit	#	% by unit
Low	1,746	772	2.1	44.2	553	31.7	421	24.1
Moderate	10,713	6,252	17.2	58.4	2,957	27.6	1,504	14.0
Middle	45,747	29,275	80.6	64.0	10,016	21.9	6,456	14.1
Upper	0	0	0.0	0.0	0	0.0	0	0.0
Unknown	0	0	0.0	0.0	0	0.0	0	0.0
Total AA	58,206	36,299	100.0	62.4	13,526	23.2	8,381	14.4
	Total Businesses by Tract	Businesses by Tract & Revenue Size						
		Less Than or = \$1 Million		Over \$1 Million		Revenue Not Reported		
		#	%	#	%	#	%	
Low	111	3.0	98	2.9	6	2.3	7	5.9
Moderate	798	21.5	707	21.2	65	24.8	26	22.0
Middle	2,804	75.5	2,528	75.8	191	72.9	85	72.0
Upper	0	0.0	0	0.0	0	0.0	0	0.0
Unknown	0	0.0	0	0.0	0	0.0	0	0.0
Total AA	3,713	100.0	3,333	100.0	262	100.0	118	100.0
Percentage of Total Businesses:			89.8		7.1		3.2	
	Total Farms by Tract	Farms by Tract & Revenue Size						
		Less Than or = \$1 Million		Over \$1 Million		Revenue Not Reported		
		#	%	#	%	#	%	
Low	1	0.4	1	0.4	0	0.0	0	0.0
Moderate	36	13.8	36	14.0	0	0.0	0	0.0
Middle	224	85.8	221	85.7	2	100.0	1	100.0
Upper	0	0.0	0	0.0	0	0.0	0	0.0
Unknown	0	0.0	0	0.0	0	0.0	0	0.0
Total AA	261	100.0	258	100.0	2	100.0	1	100.0
Percentage of Total Farms:			98.9		0.8		0.4	
<p>Source: 2020 FFIEC Census Data 2020 Dun & Bradstreet Data 2011-2015 U.S. Census Bureau: American Community Survey</p> <p>Note: Percentages may not total 100.0 percent due to rounding.</p>								

2019 NONMETROPOLITAN OHIO AA DEMOGRAPHICS								
Income Categories	Tract Distribution		Families by Tract Income		Families < Poverty Level as % of Families by Tract		Families by Family Income	
	#	%	#	%	#	%	#	%
Low	1	3.4	776	2.3	275	35.4	9,405	27.7
Moderate	6	20.7	6,346	18.7	1,464	23.1	6,466	19.1
Middle	22	75.9	26,808	79.0	4,126	15.4	6,481	19.1
Upper	0	0.0	0	0.0	0	0.0	11,578	34.1
Unknown	0	0.0	0	0.0	0	0.0	0	0.0
Total AA	29	100.0	33,930	100.0	5,865	17.3	33,930	100.0
	Housing Units by Tract	Housing Type by Tract						
		Owner-occupied			Rental		Vacant	
		#	% by tract	% by unit	#	% by unit	#	% by unit
Low	1,746	772	2.1	44.2	553	31.7	421	24.1
Moderate	10,713	6,252	17.2	58.4	2,957	27.6	1,504	14.0
Middle	45,747	29,275	80.6	64.0	10,016	21.9	6,456	14.1
Upper	0	0	0.0	0.0	0	0.0	0	0.0
Unknown	0	0	0.0	0.0	0	0.0	0	0.0
Total AA	58,206	36,299	100.0	62.4	13,526	23.2	8,381	14.4
	Total Businesses by Tract	Businesses by Tract & Revenue Size						
		Less Than or = \$1 Million		Over \$1 Million		Revenue Not Reported		
		#	%	#	%	#	%	
Low	115	3.0	102	3.0	6	2.3	7	5.9
Moderate	829	21.7	735	21.3	67	25.2	27	22.7
Middle	2,884	75.3	2,606	75.7	193	72.6	85	71.4
Upper	0	0.0	0	0.0	0	0.0	0	0.0
Unknown	0	0.0	0	0.0	0	0.0	0	0.0
Total AA	3,828	100.0	3,443	100.0	266	100.0	119	100.0
Percentage of Total Businesses:				89.9		6.9		3.1
	Total Farms by Tract	Farms by Tract & Revenue Size						
		Less Than or = \$1 Million		Over \$1 Million		Revenue Not Reported		
		#	%	#	%	#	%	
Low	1	0.4	1	0.4	0	0.0	0	0.0
Moderate	40	14.4	40	14.6	0	0.0	0	0.0
Middle	237	85.3	233	85.0	3	100.0	1	100.0
Upper	0	0.0	0	0.0	0	0.0	0	0.0
Unknown	0	0.0	0	0.0	0	0.0	0	0.0
Total AA	278	100.0	274	100.0	3	100.0	1	100.0
Percentage of Total Farms:				98.6		1.1		0.4
Source: 2019 FFIEC Census Data 2019 Dun & Bradstreet Data 2011-2015 U.S. Census Bureau: American Community Survey Note: Percentages may not total 100.0 percent due to rounding.								

2018 NONMETROPOLITAN OHIO AA DEMOGRAPHICS								
Income Categories	Tract Distribution		Families by Tract Income		Families < Poverty Level as % of Families by Tract		Families by Family Income	
	#	%	#	%	#	%	#	%
Low	1	3.4	776	2.3	275	35.4	9,482	27.9
Moderate	9	31.0	9,177	27.0	1,985	21.6	6,503	19.2
Middle	19	65.5	23,977	70.7	3,605	15.0	6,508	19.2
Upper	0	0.0	0	0.0	0	0.0	11,437	33.7
Unknown	0	0.0	0	0.0	0	0.0	0	0.0
Total AA	29	100.0	33,930	100.0	5,865	17.3	33,930	100.0
	Housing Units by Tract	Housing Type by Tract						
		Owner-occupied			Rental		Vacant	
		#	% by tract	% by unit	#	% by unit	#	% by unit
Low	1,746	772	2.1	44.2	553	31.7	421	24.1
Moderate	15,612	9,269	25.5	59.4	3,994	25.6	2,349	15.0
Middle	40,848	26,258	72.3	64.3	8,979	22.0	5,611	13.7
Upper	0	0	0.0	0.0	0	0.0	0	0.0
Unknown	0	0	0.0	0.0	0	0.0	0	0.0
Total AA	58,206	36,299	100.0	62.4	13,526	23.2	8,381	14.4
	Total Businesses by Tract	Businesses by Tract & Revenue Size						
		Less Than or = \$1 Million		Over \$1 Million		Revenue Not Reported		
		#	%	#	%	#	%	
Low	113	2.9	100	2.8	6	2.2	7	4.9
Moderate	1,188	30.2	1,054	29.9	89	33.3	45	31.3
Middle	2,631	66.9	2,367	67.2	172	64.4	92	63.9
Upper	0	0.0	0	0.0	0	0.0	0	0.0
Unknown	0	0.0	0	0.0	0	0.0	0	0.0
Total AA	3,932	100.0	3,521	100.0	267	100.0	144	100.0
Percentage of Total Businesses:				89.5		6.8		3.7
	Total Farms by Tract	Farms by Tract & Revenue Size						
		Less Than or = \$1 Million		Over \$1 Million		Revenue Not Reported		
		#	%	#	%	#	%	
Low	1	0.3	1	0.3	0	0.0	0	0.0
Moderate	82	27.4	81	27.6	1	25.0	0	0.0
Middle	216	72.2	212	72.1	3	75.0	1	100.0
Upper	0	0.0	0	0.0	0	0.0	0	0.0
Unknown	0	0.0	0	0.0	0	0.0	0	0.0
Total AA	299	100.0	294	100.0	4	100.0	1	100.0
Percentage of Total Farms:				98.3		1.3		0.3
<i>Source: 2018 FFIEC Census Data 2018 Dun & Bradstreet Data 2011-2015 U.S. Census Bureau: American Community Survey</i>								
<i>Note: Percentages may not total 100.0 percent due to rounding.</i>								

2021 HUNTINGTON-ASHLAND, WV-KY-OH MSA #26580 AA DEMOGRAPHICS								
Income Categories	Tract Distribution		Families by Tract Income		Families < Poverty Level as % of Families by Tract		Families by Family Income	
	#	%	#	%	#	%	#	%
Low	5	17.2	2,285	9.9	1,010	44.2	5,521	24.0
Moderate	6	20.7	2,452	10.6	691	28.2	3,630	15.7
Middle	10	34.5	12,191	52.9	1,303	10.7	4,452	19.3
Upper	7	24.1	6,045	26.2	403	6.7	9,445	41.0
Unknown	1	3.4	75	0.3	44	58.7	0	0.0
Total AA	29	100.0	23,048	100.0	3,451	15.0	23,048	100.0
	Housing Units by Tract	Housing Type by Tract						
		Owner-occupied			Rental		Vacant	
		#	% by tract	% by unit	#	% by unit	#	% by unit
Low	6,927	1,776	7.3	25.6	3,623	52.3	1,528	22.1
Moderate	6,054	2,322	9.5	38.4	2,643	43.7	1,089	18.0
Middle	21,431	12,819	52.5	59.8	5,957	27.8	2,655	12.4
Upper	11,378	7,487	30.7	65.8	2,897	24.9	1,054	9.3
Unknown	586	17	0.1	2.9	492	84.0	77	13.1
Total AA	46,376	24,421	100.0	52.7	15,552	33.5	6,403	13.8
	Total Businesses by Tract	Businesses by Tract & Revenue Size						
		Less Than or = \$1 Million		Over \$1 Million		Revenue Not Reported		
		#	%	#	%	#	%	
Low	831	24.9	704	23.9	116	33.4	11	26.2
Moderate	370	11.1	318	10.8	50	14.4	2	4.8
Middle	1,418	42.5	1,284	43.6	116	33.4	18	42.9
Upper	677	20.3	609	20.7	58	16.7	10	23.8
Unknown	37	1.1	29	1.0	7	2.0	1	2.4
Total AA	3,333	100.0	2,944	100.0	347	100.0	42	100.0
Percentage of Total Businesses:				88.3		10.4		1.3
	Total Farms by Tract	Farms by Tract & Revenue Size						
		Less Than or = \$1 Million		Over \$1 Million		Revenue Not Reported		
		#	%	#	%	#	%	
Low	0	0.0	0	0.0	0	0.0	0	0.0
Moderate	1	2.9	1	2.9	0	0.0	0	0.0
Middle	22	64.7	22	64.7	0	0.0	0	0.0
Upper	11	32.4	11	32.4	0	0.0	0	0.0
Unknown	0	0.0	0	0.0	0	0.0	0	0.0
Total AA	34	100.0	34	100.0	0	0.0	0	0.0
Percentage of Total Farms:				100.0		0.0		0.0
<i>Source: 2021 FFIEC Census Data 2021 Dun & Bradstreet Data 2011-2015 U.S. Census Bureau: American Community Survey</i>								
<i>Note: Percentages may not total 100.0 percent due to rounding.</i>								

2020 HUNTINGTON-ASHLAND, WV-KY-OH MSA #26580 AA DEMOGRAPHICS								
Income Categories	Tract Distribution		Families by Tract Income		Families < Poverty Level as % of Families by Tract		Families by Family Income	
	#	%	#	%	#	%	#	%
Low	5	17.2	2,285	9.9	1,010	44.2	5,521	24.0
Moderate	6	20.7	2,452	10.6	691	28.2	3,630	15.7
Middle	10	34.5	12,191	52.9	1,303	10.7	4,452	19.3
Upper	7	24.1	6,045	26.2	403	6.7	9,445	41.0
Unknown	1	3.4	75	0.3	44	58.7	0	0.0
Total AA	29	100.0	23,048	100.0	3,451	15.0	23,048	100.0
	Housing Units by Tract	Housing Type by Tract						
		Owner-occupied			Rental		Vacant	
		#	% by tract	% by unit	#	% by unit	#	% by unit
Low	6,927	1,776	7.3	25.6	3,623	52.3	1,528	22.1
Moderate	6,054	2,322	9.5	38.4	2,643	43.7	1,089	18.0
Middle	21,431	12,819	52.5	59.8	5,957	27.8	2,655	12.4
Upper	11,378	7,487	30.7	65.8	2,837	24.9	1,054	9.3
Unknown	586	17	0.1	2.9	492	84.0	77	13.1
Total AA	46,376	24,421	100.0	52.7	15,552	33.5	6,403	13.8
	Total Businesses by Tract		Businesses by Tract & Revenue Size					
	#	%	Less Than or = \$1 Million		Over \$1 Million		Revenue Not Reported	
			#	%	#	%	#	%
Low	855	25.1	727	24.1	119	33.5	9	23.1
Moderate	386	11.3	328	10.9	55	15.5	3	7.7
Middle	1,444	42.3	1,309	43.4	118	33.2	17	43.6
Upper	686	20.1	621	20.6	56	15.8	9	23.1
Unknown	40	1.2	32	1.1	7	2.0	1	2.6
Total AA	3,411	100.0	3,017	100.0	355	100.0	39	100.0
Percentage of Total Businesses:			88.4		10.4		1.1	
	Total Farms by Tract		Farms by Tract & Revenue Size					
	#	%	Less Than or = \$1 Million		Over \$1 Million		Revenue Not Reported	
			#	%	#	%	#	%
Low	2	5.3	2	5.3	0	0.0	0	0.0
Moderate	1	2.6	1	2.6	0	0.0	0	0.0
Middle	24	63.2	24	63.2	0	0.0	0	0.0
Upper	11	28.9	11	28.9	0	0.0	0	0.0
Unknown	0	0.0	0	0.0	0	0.0	0	0.0
Total AA	38	100.0	38	100.0	0	0.0	0	0.0
Percentage of Total Farms:			100.0		0.0		0.0	
<p>Source: 2020 FFIEC Census Data 2020 Dun & Bradstreet Data 2011-2015 U.S. Census Bureau: American Community Survey</p> <p>Note: Percentages may not total 100.0 percent due to rounding.</p>								

2019 HUNTINGTON-ASHLAND, WV-KY-OH MSA #26580 AA DEMOGRAPHICS								
Income Categories	Tract Distribution		Families by Tract Income		Families < Poverty Level as % of Families by Tract		Families by Family Income	
	#	%	#	%	#	%	#	%
Low	5	17.2	2,285	9.9	1,010	44.2	5,521	24.0
Moderate	6	20.7	2,452	10.6	691	28.2	3,630	15.7
Middle	10	34.5	12,191	52.9	1,303	10.7	4,452	19.3
Upper	7	24.1	6,045	26.2	403	6.7	9,445	41.0
Unknown	1	3.4	75	0.3	44	58.7	0	0.0
Total AA	29	100.0	23,048	100.0	3,451	15.0	23,048	100.0
	Housing Units by Tract	Housing Type by Tract						
		Owner-occupied			Rental		Vacant	
		#	% by tract	% by unit	#	% by unit	#	% by unit
Low	6,927	1,776	7.3	25.6	3,623	52.3	1,528	22.1
Moderate	6,054	2,322	9.5	38.4	2,643	43.7	1,089	18.0
Middle	21,431	12,819	52.5	59.8	5,957	27.8	2,655	12.4
Upper	11,378	7,487	30.7	65.8	2,837	24.9	1,054	9.3
Unknown	586	17	0.1	2.9	492	84.0	77	13.1
Total AA	46,376	24,421	100.0	52.7	15,552	33.5	6,403	13.8
	Total Businesses by Tract	Businesses by Tract & Revenue Size						
		Less Than or = \$1 Million		Over \$1 Million		Revenue Not Reported		
		#	%	#	%	#	%	
Low	834	25.1	709	24.2	115	31.9	10	27.0
Moderate	382	11.5	323	11.0	57	15.8	2	5.4
Middle	1,401	42.1	1,264	43.2	122	33.9	15	40.5
Upper	666	20.0	598	20.4	59	16.4	9	24.3
Unknown	41	1.2	33	1.1	7	1.9	1	2.7
Total AA	3,324	100.0	2,927	100.0	360	100.0	37	100.0
Percentage of Total Businesses:				88.1		10.8		1.1
	Total Farms by Tract	Farms by Tract & Revenue Size						
		Less Than or = \$1 Million		Over \$1 Million		Revenue Not Reported		
		#	%	#	%	#	%	
Low	2	4.5	2	4.7	0	0.0	0	0.0
Moderate	1	2.3	1	2.3	0	0.0	0	0.0
Middle	28	63.6	27	62.8	1	100.0	0	0.0
Upper	13	29.5	13	30.2	0	0.0	0	0.0
Unknown	0	0.0	0	0.0	0	0.0	0	0.0
Total AA	44	100.0	43	100.0	1	100.0	0	0.0
Percentage of Total Farms:				97.7		2.3		0.0
Source: 2019 FFIEC Census Data 2019 Dun & Bradstreet Data 2011-2015 U.S. Census Bureau: American Community Survey Note: Percentages may not total 100.0 percent due to rounding.								

2018 HUNTINGTON-ASHLAND, WV-KY-OH MSA #26580 AA DEMOGRAPHICS								
Income Categories	Tract Distribution		Families by Tract Income		Families < Poverty Level as % of Families by Tract		Families by Family Income	
	#	%	#	%	#	%	#	%
Low	5	17.2	2,285	9.9	1,010	44.2	5,573	24.2
Moderate	6	20.7	2,452	10.6	691	28.2	3,674	15.9
Middle	10	34.5	12,191	52.9	1,303	10.7	4,453	19.3
Upper	7	24.1	6,045	26.2	403	6.7	9,348	40.6
Unknown	1	3.4	75	0.3	44	58.7	0	0.0
Total AA	29	100.0	23,048	100.0	3,451	15.0	23,048	100.0
	Housing Units by Tract	Housing Type by Tract						
		Owner-occupied			Rental		Vacant	
		#	% by tract	% by unit	#	% by unit	#	% by unit
Low	6,927	1,776	7.3	25.6	3,623	52.3	1,528	22.1
Moderate	6,054	2,322	9.5	38.4	2,643	43.7	1,089	18.0
Middle	21,431	12,819	52.5	59.8	5,957	27.8	2,655	12.4
Upper	11,378	7,487	30.7	65.8	2,837	24.9	1,054	9.3
Unknown	586	17	0.1	2.9	492	84.0	77	13.1
Total AA	46,376	24,421	100.0	52.7	15,552	33.5	6,403	13.8
	Total Businesses by Tract	Businesses by Tract & Revenue Size						
		Less Than or = \$1 Million		Over \$1 Million		Revenue Not Reported		
		#	%	#	%	#	%	
Low	858	24.8	722	23.7	123	33.0	13	31.0
Moderate	386	11.2	325	10.7	58	15.5	3	7.1
Middle	1,453	42.0	1,315	43.2	123	33.0	15	35.7
Upper	722	20.9	651	21.4	61	16.4	10	23.8
Unknown	38	1.1	29	1.0	8	2.1	1	2.4
Total AA	3,457	100.0	3,042	100.0	373	100.0	42	100.0
Percentage of Total Businesses:				88.0		10.8		1.2
	Total Farms by Tract	Farms by Tract & Revenue Size						
		Less Than or = \$1 Million		Over \$1 Million		Revenue Not Reported		
		#	%	#	%	#	%	
Low	1	2.4	1	2.5	0	0.0	0	0.0
Moderate	1	2.4	1	2.5	0	0.0	0	0.0
Middle	27	65.9	26	65.0	1	100.0	0	0.0
Upper	12	29.3	12	30.0	0	0.0	0	0.0
Unknown	0	0.0	0	0.0	0	0.0	0	0.0
Total AA	41	100.0	40	100.0	1	100.0	0	0.0
Percentage of Total Farms:				97.6		2.4		0.0
Source: 2018 FFIEC Census Data 2018 Dun & Bradstreet Data 2011-2015 U.S. Census Bureau: American Community Survey Note: Percentages may not total 100.0 percent due to rounding.								

2021 NONMETROPOLITAN WEST VIRGINIA AA DEMOGRAPHICS								
Income Categories	Tract Distribution		Families by Tract Income		Families < Poverty Level as % of Families by Tract		Families by Family Income	
	#	%	#	%	#	%	#	%
Low	0	0.0	0	0.0	0	0.0	1,599	22.1
Moderate	0	0.0	0	0.0	0	0.0	1,411	19.5
Middle	6	100.0	7,244	100.0	1,142	15.8	1,590	21.9
Upper	0	0.0	0	0.0	0	0.0	2,644	36.5
Unknown	0	0.0	0	0.0	0	0.0	0	0.0
Total AA	6	100.0	7,244	100.0	1,142	15.8	7,244	100.0
	Housing Units by Tract	Housing Type by Tract						
		Owner-occupied			Rental		Vacant	
		#	% by tract	% by unit	#	% by unit	#	% by unit
Low	0	0	0.0	0.0	0	0.0	0	0.0
Moderate	0	0	0.0	0.0	0	0.0	0	0.0
Middle	12,952	8,614	100.0	66.5	2,224	17.2	2,114	16.3
Upper	0	0	0.0	0.0	0	0.0	0	0.0
Unknown	0	0	0.0	0.0	0	0.0	0	0.0
Total AA	12,952	8,614	100.0	66.5	2,224	17.2	2,114	16.3
	Total Businesses by Tract	Businesses by Tract & Revenue Size						
		Less Than or = \$1 Million		Over \$1 Million		Revenue Not Reported		
		#	%	#	%	#	%	
Low	0	0.0	0	0.0	0	0.0	0	0.0
Moderate	0	0.0	0	0.0	0	0.0	0	0.0
Middle	573	100.0	522	100.0	34	100.0	17	100.0
Upper	0	0.0	0	0.0	0	0.0	0	0.0
Unknown	0	0.0	0	0.0	0	0.0	0	0.0
Total AA	573	100.0	522	100.0	34	100.0	17	100.0
Percentage of Total Businesses:			91.1		5.9		3.0	
	Total Farms by Tract	Farms by Tract & Revenue Size						
		Less Than or = \$1 Million		Over \$1 Million		Revenue Not Reported		
		#	%	#	%	#	%	
Low	0	0.0	0	0.0	0	0.0	0	0.0
Moderate	0	0.0	0	0.0	0	0.0	0	0.0
Middle	55	100.0	55	100.0	0	0.0	0	0.0
Upper	0	0.0	0	0.0	0	0.0	0	0.0
Unknown	0	0.0	0	0.0	0	0.0	0	0.0
Total AA	55	100.0	55	100.0	0	0.0	0	0.0
Percentage of Total Farms:			100.0		0.0		0.0	
<i>Source: 2021 FFIEC Census Data 2021 Dun & Bradstreet Data 2011-2015 U.S. Census Bureau: American Community Survey</i>								
<i>Note: Percentages may not total 100.0 percent due to rounding.</i>								

2020 NONMETROPOLITAN WEST VIRGINIA AA DEMOGRAPHICS								
Income Categories	Tract Distribution		Families by Tract Income		Families < Poverty Level as % of Families by Tract		Families by Family Income	
	#	%	#	%	#	%	#	%
Low	0	0.0	0	0.0	0	0.0	1,599	22.1
Moderate	0	0.0	0	0.0	0	0.0	1,411	19.5
Middle	6	100.0	7,244	100.0	1,142	15.8	1,590	21.9
Upper	0	0.0	0	0.0	0	0.0	2,644	36.5
Unknown	0	0.0	0	0.0	0	0.0	0	0.0
Total AA	6	100.0	7,244	100.0	1,142	15.8	7,244	100.0
	Housing Units by Tract	Housing Type by Tract						
		Owner-occupied			Rental		Vacant	
		#	% by tract	% by unit	#	% by unit	#	% by unit
Low	0	0	0.0	0.0	0	0.0	0	0.0
Moderate	0	0	0.0	0.0	0	0.0	0	0.0
Middle	12,952	8,614	100.0	66.5	2,224	17.2	2,114	16.3
Upper	0	0	0.0	0.0	0	0.0	0	0.0
Unknown	0	0	0.0	0.0	0	0.0	0	0.0
Total AA	12,952	8,614	100.0	66.5	2,224	17.2	2,114	16.3
	Total Businesses by Tract	Businesses by Tract & Revenue Size						
		Less Than or = \$1 Million		Over \$1 Million		Revenue Not Reported		
		#	%	#	%	#	%	
Low	0	0.0	0	0.0	0	0.0	0	0.0
Moderate	0	0.0	0	0.0	0	0.0	0	0.0
Middle	577	100.0	524	100.0	37	100.0	16	100.0
Upper	0	0.0	0	0.0	0	0.0	0	0.0
Unknown	0	0.0	0	0.0	0	0.0	0	0.0
Total AA	577	100.0	524	100.0	37	100.0	16	100.0
Percentage of Total Businesses:				90.8		6.4		2.8
	Total Farms by Tract	Farms by Tract & Revenue Size						
		Less Than or = \$1 Million		Over \$1 Million		Revenue Not Reported		
		#	%	#	%	#	%	
Low	0	0.0	0	0.0	0	0.0	0	0.0
Moderate	0	0.0	0	0.0	0	0.0	0	0.0
Middle	56	100.0	56	100.0	0	0.0	0	0.0
Upper	0	0.0	0	0.0	0	0.0	0	0.0
Unknown	0	0.0	0	0.0	0	0.0	0	0.0
Total AA	56	100.0	56	100.0	0	0.0	0	0.0
Percentage of Total Farms:				100.0		0.0		0.0
Source: 2020 FFIEC Census Data 2020 Dun & Bradstreet Data 2011-2015 U.S. Census Bureau: American Community Survey Note: Percentages may not total 100.0 percent due to rounding.								

2019 NONMETROPOLITAN WEST VIRGINIA AA DEMOGRAPHICS								
Income Categories	Tract Distribution		Families by Tract Income		Families < Poverty Level as % of Families by Tract		Families by Family Income	
	#	%	#	%	#	%	#	%
Low	0	0.0	0	0.0	0	0.0	1,599	22.1
Moderate	0	0.0	0	0.0	0	0.0	1,411	19.5
Middle	6	100.0	7,244	100.0	1,142	15.8	1,590	21.9
Upper	0	0.0	0	0.0	0	0.0	2,644	36.5
Unknown	0	0.0	0	0.0	0	0.0	0	0.0
Total AA	6	100.0	7,244	100.0	1,142	15.8	7,244	100.0
	Housing Units by Tract	Housing Type by Tract						
		Owner-occupied			Rental		Vacant	
		#	% by tract	% by unit	#	% by unit	#	% by unit
Low	0	0	0.0	0.0	0	0.0	0	0.0
Moderate	0	0	0.0	0.0	0	0.0	0	0.0
Middle	12,952	8,614	100.0	66.5	2,224	17.2	2,114	16.3
Upper	0	0	0.0	0.0	0	0.0	0	0.0
Unknown	0	0	0.0	0.0	0	0.0	0	0.0
Total AA	12,952	8,614	100.0	66.5	2,224	17.2	2,114	16.3
	Total Businesses by Tract	Businesses by Tract & Revenue Size						
		Less Than or = \$1 Million		Over \$1 Million		Revenue Not Reported		
		#	%	#	%	#	%	
Low	0	0.0	0	0.0	0	0.0	0	0.0
Moderate	0	0.0	0	0.0	0	0.0	0	0.0
Middle	567	100.0	516	100.0	36	100.0	15	100.0
Upper	0	0.0	0	0.0	0	0.0	0	0.0
Unknown	0	0.0	0	0.0	0	0.0	0	0.0
Total AA	567	100.0	516	100.0	36	100.0	15	100.0
Percentage of Total Businesses:				91.0		6.3		2.6
	Total Farms by Tract	Farms by Tract & Revenue Size						
		Less Than or = \$1 Million		Over \$1 Million		Revenue Not Reported		
		#	%	#	%	#	%	
Low	0	0.0	0	0.0	0	0.0	0	0.0
Moderate	0	0.0	0	0.0	0	0.0	0	0.0
Middle	52	100.0	51	100.0	1	100.0	0	0.0
Upper	0	0.0	0	0.0	0	0.0	0	0.0
Unknown	0	0.0	0	0.0	0	0.0	0	0.0
Total AA	52	100.0	51	100.0	1	100.0	0	0.0
Percentage of Total Farms:				98.1		1.9		0.0
<i>Source: 2019 FFIEC Census Data 2019 Dun & Bradstreet Data 2011-2015 U.S. Census Bureau: American Community Survey</i>								
<i>Note: Percentages may not total 100.0 percent due to rounding.</i>								

2018 NONMETROPOLITAN WEST VIRGINIA AA DEMOGRAPHICS								
Income Categories	Tract Distribution		Families by Tract Income		Families < Poverty Level as % of Families by Tract		Families by Family Income	
	#	%	#	%	#	%	#	%
Low	0	0.0	0	0.0	0	0.0	1,618	22.3
Moderate	0	0.0	0	0.0	0	0.0	1,429	19.7
Middle	6	100.0	7,244	100.0	1,142	15.8	1,592	22.0
Upper	0	0.0	0	0.0	0	0.0	2,605	36.0
Unknown	0	0.0	0	0.0	0	0.0	0	0.0
Total AA	6	100.0	7,244	100.0	1,142	15.8	7,244	100.0
	Housing Units by Tract	Housing Type by Tract						
		Owner-occupied			Rental		Vacant	
		#	% by tract	% by unit	#	% by unit	#	% by unit
Low	0	0	0.0	0.0	0	0.0	0	0.0
Moderate	0	0	0.0	0.0	0	0.0	0	0.0
Middle	12,952	8,614	100.0	66.5	2,224	17.2	2,114	16.3
Upper	0	0	0.0	0.0	0	0.0	0	0.0
Unknown	0	0	0.0	0.0	0	0.0	0	0.0
Total AA	12,952	8,614	100.0	66.5	2,224	17.2	2,114	16.3
	Total Businesses by Tract	Businesses by Tract & Revenue Size						
		Less Than or = \$1 Million		Over \$1 Million		Revenue Not Reported		
		#	%	#	%	#	%	
Low	0	0.0	0	0.0	0	0.0	0	0.0
Moderate	0	0.0	0	0.0	0	0.0	0	0.0
Middle	569	100.0	514	100.0	37	100.0	18	100.0
Upper	0	0.0	0	0.0	0	0.0	0	0.0
Unknown	0	0.0	0	0.0	0	0.0	0	0.0
Total AA	569	100.0	514	100.0	37	100.0	18	100.0
Percentage of Total Businesses:				90.3		6.5		3.2
	Total Farms by Tract	Farms by Tract & Revenue Size						
		Less Than or = \$1 Million		Over \$1 Million		Revenue Not Reported		
		#	%	#	%	#	%	
Low	0	0.0	0	0.0	0	0.0	0	0.0
Moderate	0	0.0	0	0.0	0	0.0	0	0.0
Middle	59	100.0	58	100.0	1	100.0	0	0.0
Upper	0	0.0	0	0.0	0	0.0	0	0.0
Unknown	0	0.0	0	0.0	0	0.0	0	0.0
Total AA	59	100.0	58	100.0	1	100.0	0	0.0
Percentage of Total Farms:				98.3		1.7		0.0
<p>Source: 2018 FFIEC Census Data 2018 Dun & Bradstreet Data 2011-2015 U.S. Census Bureau: American Community Survey</p> <p>Note: Percentages may not total 100.0 percent due to rounding.</p>								

Appendix D – Lending Tables

Distribution of January 1, 2021 – June 30, 2021 HMDA Reportable Loans by Borrower Income Level Assessment Area: Nonmetropolitan Ohio					
Borrower Income Level	Bank Loans*				Families by Family Income %
	#	#%	\$(000)	\$%	
Home Purchase Loans					
Low	0	0.0	0	0.0	27.7
Moderate	16	27.1	1,664	19.2	19.1
Middle	13	22.0	1,372	15.8	19.1
Upper	23	39.0	4,312	49.6	34.1
Unknown	7	11.9	1,338	15.4	0.0
Total	59	100.0	8,686	100.0	100.0
Refinance Loans					
Low	2	3.3	102	1.4	27.7
Moderate	5	8.3	364	4.9	19.1
Middle	12	20.0	1,130	15.1	19.1
Upper	41	68.3	5,884	78.7	34.1
Unknown	0	0.0	0	0.0	0.0
Total	60	100.0	7,479	100.0	100.0
Home Improvement Loans					
Low	0	0.0	0	0.0	27.7
Moderate	1	100.0	60	100.0	19.1
Middle	0	0.0	0	0.0	19.1
Upper	0	0.0	0	0.0	34.1
Unknown	0	0.0	0	0.0	0.0
Total	1	100.0	60	100.0	100.0
Total HMDA Reportable Loans					
Low	2	1.6	102	0.6	27.7
Moderate	23	18.4	2,116	12.7	19.1
Middle	26	20.8	2,534	15.2	19.1
Upper	66	52.8	10,306	61.9	34.1
Unknown	8	6.4	1,601	9.6	0.0
Total	125	100.0	16,659	100.0	100.0
<i>Source: 2021 FFIEC Census Data 2011-2015 U.S. Census Bureau: American Community Survey</i>					
<i>Note: Percentages may not total 100.0 percent due to rounding. Multifamily loans are not included in the borrower distribution analysis. *Aggregate data is not currently available.</i>					

Distribution of January 1, 2021 – June 30, 2021 HMDA Reportable Loans by Borrower Income Level Assessment Area: Nonmetropolitan Ohio					
Borrower Income Level	Bank Loans*				Families by Family Income %
	#	#%	\$(000)	%	
Other Purpose LOC					
Low	0	0.0	0	0.0	27.7
Moderate	0	0.0	0	0.0	19.1
Middle	0	0.0	0	0.0	19.1
Upper	0	0.0	0	0.0	34.1
Unknown	0	0.0	0	0.0	0.0
Total	0	0.0	0	0.0	100.0
Other Purpose Closed/Exempt					
Low	0	0.0	0	0.0	27.7
Moderate	1	25.0	28	16.5	19.1
Middle	1	25.0	32	18.8	19.1
Upper	2	50.0	110	64.7	34.1
Unknown	0	0.0	0	0.0	0.0
Total	4	100.0	170	100.0	100.0
Purpose Not Applicable					
Low	0	0.0	0	0.0	27.7
Moderate	0	0.0	0	0.0	19.1
Middle	0	0.0	0	0.0	19.1
Upper	0	0.0	0	0.0	34.1
Unknown	0	0.0	0	0.0	0.0
Total	0	0.0	0	0.0	100.0
Source: 2021 FFIEC Census Data 2011-2015 U.S. Census Bureau: American Community Survey Note: Percentages may not total 100.0 percent due to rounding. Multifamily loans are not included in the borrower distribution analysis. *Aggregate data is not currently available					

Distribution of 2020 HMDA Reportable Loans by Borrower Income Level							
Assessment Area: Nonmetropolitan Ohio							
Borrower Income Level	Bank and Aggregate Loans						Families by Family Income %
	Bank		Agg	Bank		Agg	
	#	%	%	\$(000)	%	\$%	
Home Purchase Loans							
Low	8	5.0	7.1	392	1.6	3.9	27.7
Moderate	30	18.8	23.1	2,866	11.7	17.4	19.1
Middle	23	14.4	25.0	2,889	11.8	23.4	19.1
Upper	78	48.8	29.9	15,952	65.4	41.0	34.1
Unknown	21	13.1	14.9	2,302	9.4	14.4	0.0
Total	160	100.0	100.0	24,401	100.0	100.0	100.0
Refinance Loans							
Low	4	1.9	4.2	270	0.9	2.2	27.7
Moderate	17	8.1	11.0	1,541	5.0	7.8	19.1
Middle	36	17.2	20.2	4,201	13.7	16.4	19.1
Upper	138	66.0	43.8	22,504	73.2	49.5	34.1
Unknown	14	6.7	20.8	2,234	7.3	24.1	0.0
Total	209	100.0	100.0	30,750	100.0	100.0	100.0
Home Improvement Loans							
Low	0	0.0	5.4	0	0.0	2.5	27.7
Moderate	0	0.0	19.6	0	0.0	12.4	19.1
Middle	1	25.0	16.3	13	1.8	9.8	19.1
Upper	3	75.0	50.0	720	98.2	51.0	34.1
Unknown	0	0.0	8.7	0	0.0	24.3	0.0
Total	4	100.0	100.0	733	100.0	100.0	100.0
Total HMDA Reportable Loans							
Low	12	3.2	5.5	662	1.2	3.0	27.7
Moderate	47	12.4	16.9	4,407	7.8	12.5	19.1
Middle	60	15.8	22.2	7,103	12.5	19.5	19.1
Upper	224	59.1	36.8	39,732	70.0	44.8	34.1
Unknown	36	9.5	18.6	4,841	8.5	20.2	0.0
Total	379	100.0	100.0	56,745	100.0	100.0	100.0
Source: 2020 FFIEC Census Data 2011-2015 U.S. Census Bureau: American Community Survey							
Note: Percentages may not total 100.0 percent due to rounding. Multifamily loans are not included in the borrower distribution analysis.							

Distribution of 2020 HMDA Reportable Loans by Borrower Income Level							
Assessment Area: Nonmetropolitan Ohio							
Borrower Income Level	Bank and Aggregate Loans						Families by Family Income %
	Bank		Agg	Bank		Agg	
	#	#%	#%	\$(000)	\$%	\$%	
Other Purpose LOC							
Low	0	0.0	6.7	0	0.0	2.7	27.7
Moderate	0	0.0	23.3	0	0.0	23.5	19.1
Middle	0	0.0	20.0	0	0.0	18.3	19.1
Upper	0	0.0	50.0	0	0.0	55.5	34.1
Unknown	0	0.0	0.0	0	0.0	0.0	0.0
Total	0	0.0	100.0	0	0.0	100.0	100.0
Other Purpose Closed/Exempt							
Low	0	0.0	2.8	0	0.0	1.4	27.7
Moderate	0	0.0	13.9	0	0.0	14.0	19.1
Middle	0	0.0	31.9	0	0.0	24.7	19.1
Upper	5	100.0	48.6	556	100.0	58.6	34.1
Unknown	0	0.0	2.8	0	0.0	1.4	0.0
Total	5	100.0	100.0	556	100.0	100.0	100.0
Purpose Not Applicable							
Low	0	0.0	0.0	0	0.0	0.0	27.7
Moderate	0	0.0	0.0	0	0.0	0.0	19.1
Middle	0	0.0	0.0	0	0.0	0.0	19.1
Upper	0	0.0	0.0	0	0.0	0.0	34.1
Unknown	0	0.0	100.0	0	0.0	100.0	0.0
Total	0	0.0	100.0	0	0.0	100.0	100.0
Source: 2020 FFIEC Census Data							
2011-2015 U.S. Census Bureau: American Community Survey							
Note: Percentages may not total 100.0 percent due to rounding.							

Distribution of 2019 HMDA Reportable Loans by Borrower Income Level							
Assessment Area: Nonmetropolitan Ohio							
Borrower Income Level	Bank and Aggregate Loans					Families by Family Income %	
	Bank		Agg	Bank			Agg
	#	%	%	\$(000)	%		\$%
Home Purchase Loans							
Low	11	10.5	6.3	665	4.4	3.6	27.7
Moderate	16	15.2	19.4	1,354	9.0	15.6	19.1
Middle	15	14.3	24.3	1,924	12.7	23.5	19.1
Upper	56	53.3	29.6	9,917	65.7	41.1	34.1
Unknown	7	6.7	20.4	1,239	8.2	16.3	0.0
Total	105	100.0	100.0	15,099	100.0	100.0	100.0
Refinance Loans							
Low	2	2.6	5.5	153	1.4	3.6	27.7
Moderate	11	14.3	15.5	1,038	9.8	10.7	19.1
Middle	15	19.5	19.3	1,540	14.5	15.7	19.1
Upper	46	59.7	44.1	7,387	69.7	50.7	34.1
Unknown	3	3.9	15.7	478	4.5	19.3	0.0
Total	77	100.0	100.0	10,596	100.0	100.0	100.0
Home Improvement Loans							
Low	2	2.6	5.5	153	1.4	3.6	27.7
Moderate	11	14.3	15.5	1,038	9.8	10.7	19.1
Middle	15	19.5	19.3	1,540	14.5	15.7	19.1
Upper	46	59.7	44.1	7,387	69.7	50.7	34.1
Unknown	3	3.9	15.7	478	4.5	19.3	0.0
Total	77	100.0	100.0	10,596	100.0	100.0	100.0
Total HMDA Reportable Loans							
Low	14	7.1	6.0	878	3.2	3.5	27.7
Moderate	31	15.7	17.9	2,626	9.5	13.7	19.1
Middle	32	16.2	22.9	3,572	12.9	20.5	19.1
Upper	109	55.3	34.9	18,119	65.5	43.5	34.1
Unknown	11	5.6	18.4	2,472	8.9	18.9	0.0
Total	197	100.0	100.0	27,667	100.0	100.0	100.0
Source: 2019 FFIEC Census Data							
2011-2015 U.S. Census Bureau: American Community Survey							
Note: Percentages may not total 100.0 percent due to rounding. Multifamily loans are not included in the borrower distribution analysis.							

Distribution of 2019 HMDA Reportable Loans by Borrower Income Level							
Assessment Area: Nonmetropolitan Ohio							
Borrower Income Level	Bank and Aggregate Loans						Families by Family Income %
	Bank		Agg	Bank		Agg	
	#	%	%	\$(000)	%	%	
Other Purpose LOC							
Low	0	0.0	5.9	0	0.0	2.2	27.7
Moderate	0	0.0	23.5	0	0.0	25.6	19.1
Middle	0	0.0	32.4	0	0.0	34.2	19.1
Upper	0	0.0	38.2	0	0.0	37.9	34.1
Unknown	0	0.0	0.0	0	0.0	0.0	0.0
Total	0	0.0	100.0	0	0.0	100.0	100.0
Other Purpose Closed/Exempt							
Low	0	0.0	8.0	0	0.0	4.8	27.7
Moderate	2	22.2	18.2	134	15.1	15.4	19.1
Middle	2	22.2	28.4	108	12.1	21.7	19.1
Upper	5	55.6	42.0	648	72.8	54.3	34.1
Unknown	0	0.0	3.4	0	0.0	3.8	0.0
Total	9	100.0	100.0	890	100.0	100.0	100.0
Purpose Not Applicable							
Low	0	0.0	0.0	0	0.0	0.0	27.7
Moderate	0	0.0	0.0	0	0.0	0.0	19.1
Middle	0	0.0	0.0	0	0.0	0.0	19.1
Upper	0	0.0	0.0	0	0.0	0.0	34.1
Unknown	0	0.0	100.0	0	0.0	100.0	0.0
Total	0	0.0	100.0	0	0.0	100.0	100.0
Source: 2019 FFIEC Census Data							
2011-2015 U.S. Census Bureau: American Community Survey							
Note: Percentages may not total 100.0 percent due to rounding.							

Distribution of 2018 HMDA Reportable Loans by Borrower Income Level							
Assessment Area: Nonmetropolitan Ohio							
Borrower Income Level	Bank and Aggregate Loans						Families by Family Income %
	Bank		Agg	Bank		Agg	
	#	%	%	\$(000)	%	%	
Home Purchase Loans							
Low	4	3.6	8.8	157	1.2	5.4	27.9
Moderate	20	18.2	21.7	1,709	12.8	17.8	19.2
Middle	25	22.7	24.1	2,641	19.8	22.0	19.2
Upper	52	47.3	30.0	7,985	60.0	39.6	33.7
Unknown	9	8.2	15.4	822	6.2	15.2	0.0
Total	110	100.0	100.0	13,314	100.0	100.0	100.0
Refinance Loans							
Low	3	4.6	9.7	132	1.7	5.5	27.9
Moderate	10	15.4	22.6	1,071	14.2	18.7	19.2
Middle	17	26.2	23.8	2,070	27.4	23.7	19.2
Upper	31	47.7	35.4	3,972	52.5	43.7	33.7
Unknown	4	6.2	8.6	318	4.2	8.3	0.0
Total	65	100.0	100.0	7,563	100.0	100.0	100.0
Home Improvement Loans							
Low	0	0.0	11.8	0	0.0	12.2	27.9
Moderate	0	0.0	13.7	0	0.0	12.9	19.2
Middle	2	40.0	30.4	72	31.0	28.4	19.2
Upper	3	60.0	43.1	160	69.0	44.6	33.7
Unknown	0	0.0	1.0	0	0.0	1.8	0.0
Total	5	100.0	100.0	232	100.0	100.0	100.0
Total HMDA Reportable Loans							
Low	8	4.3	8.8	385	1.7	5.5	27.9
Moderate	30	16.0	21.1	2,780	12.5	17.8	19.2
Middle	45	23.9	23.8	4,817	21.7	22.2	19.2
Upper	90	47.9	32.5	12,548	56.4	40.5	33.7
Unknown	15	8.0	13.9	1,710	7.7	14.1	0.0
Total	188	100.0	100.0	22,240	100.0	100.0	100.0
<i>Source: 2018 FFIEC Census Data 2011-2015 U.S. Census Bureau: American Community Survey</i>							
<i>Note: Percentages may not total 100.0 percent due to rounding. Multifamily loans are not included in the borrower distribution analysis.</i>							

Distribution of 2018 HMDA Reportable Loans by Borrower Income Level Assessment Area: Nonmetropolitan Ohio							
Borrower Income Level	Bank and Aggregate Loans						Families by Family Income %
	Bank		Agg	Bank		Agg	
	#	#%	#%	\$(000)	\$%	\$%	
Other Purpose LOC							
Low	0	0.0	2.7	0	0.0	1.7	27.9
Moderate	0	0.0	23.3	0	0.0	28.6	19.2
Middle	0	0.0	27.4	0	0.0	31.5	19.2
Upper	0	0.0	46.6	0	0.0	38.3	33.7
Unknown	0	0.0	0.0	0	0.0	0.0	0.0
Total	0	0.0	100.0	0	0.0	100.0	100.0
Other Purpose Closed/Exempt							
Low	1	14.3	9.7	96	15.7	8.5	27.9
Moderate	0	0.0	18.1	0	0.0	14.3	19.2
Middle	1	14.3	22.2	34	5.6	15.0	19.2
Upper	4	57.1	45.8	431	70.4	58.1	33.7
Unknown	1	14.3	4.2	51	8.3	4.0	0.0
Total	7	100.0	100.0	612	100.0	100.0	100.0
Purpose Not Applicable							
Low	0	0.0	0.0	0	0.0	0.0	27.9
Moderate	0	0.0	2.3	0	0.0	0.0	19.2
Middle	0	0.0	0.0	0	0.0	0.0	19.2
Upper	0	0.0	0.0	0	0.0	0.0	33.7
Unknown	0	0.0	97.7	0	0.0	100.0	0.0
Total	0	0.0	100.0	0	0.0	100.0	100.0
<i>Source: 2018 FFIEC Census Data 2011-2015 U.S. Census Bureau: American Community Survey</i>							
<i>Note: Percentages may not total 100.0 percent due to rounding.</i>							

Distribution of January 1, 2021 – June 30, 2021 HMDA Reportable Loans by Income Level of Geography Assessment Area: Nonmetropolitan Ohio					
Geographic Income Level	Bank Loans*				Owner Occupied Units %
	#	%	\$(000)	%	
Home Purchase Loans					
Low	1	1.7	133	1.5	2.1
Moderate	18	30.5	2,530	29.1	17.2
Middle	40	67.8	6,023	69.3	80.6
Upper	0	0.0	0	0.0	0.0
Total	59	100.0	8,686	100.0	100.0
Refinance Loans					
Low	1	1.7	145	1.9	2.1
Moderate	20	33.3	2,592	34.7	17.2
Middle	39	65.0	4,743	63.4	80.6
Upper	0	0.0	0	0.0	0.0
Total	60	100.0	7,479	100.0	100.0
Home Improvement Loans					
Low	0	0.0	0	0.0	2.1
Moderate	0	0.0	0	0.0	17.2
Middle	1	100.0	60	100.0	80.6
Upper	0	0.0	0	0.0	0.0
Total	1	100.0	60	100.0	100.0
Multifamily Loans					Multifamily Units %
Low	0	0.0	0	0.0	6.1
Moderate	0	0.0	0	0.0	27.9
Middle	1	100.0	263	100.1	66.0
Upper	0	0.0	0	0.0	0.0
Total	1	100.0	263	100.0	100.0
Total HMDA Reportable Loans					Owner Occupied Units %
Low	2	1.6	278	1.7	2.1
Moderate	41	32.8	5,264	31.6	17.2
Middle	82	65.6	11,117	66.7	80.6
Upper	0	0.0	0	0.0	0.0
Total	125	100.0	16,659	100.0	100.0
Source: 2021 FFIEC Census Data 2011-2015 U.S. Census Bureau: American Community Survey					
Note: Percentages may not total 100.0 percent due to rounding. *Aggregate data is not currently available.					

Distribution of January 1, 2021 – June 30, 2021 HMDA Reportable Loans by Income Level of Geography Assessment Area: Nonmetropolitan Ohio					
Geographic Income Level	Bank Loans*				Owner Occupied Units %
	#	#%	\$(000)	%	
Other Purpose LOC					
Low	0	0.0	0	0.0	2.1
Moderate	0	0.0	0	0.0	17.2
Middle	0	0.0	0	0.0	80.6
Upper	0	0.0	0	0.0	0.0
Total	0	0.0	0	0.0	100.0
Other Purpose Closed/Exempt					
Low	0	0.0	0	0.0	2.1
Moderate	3	75.0	142	83.5	17.2
Middle	1	25.0	28	16.5	80.6
Upper	0	0.0	0	0.0	0.0
Total	4	100.0	170	100.0	100.0
Purpose Not Applicable					
Low	0	0.0	0	0.0	2.1
Moderate	0	0.0	0	0.0	17.2
Middle	0	0.0	0	0.0	80.6
Upper	0	0.0	0	0.0	0.0
Total	0	0.0	0	0.0	100.0
Source: 2021 FFIEC Census Data 2011-2015 U.S. Census Bureau: American Community Survey					
Note: Percentages may not total 100.0 percent due to rounding. *Aggregate data is not currently available.					

Distribution of 2020 HMDA Reportable Loans by Income Level of Geography							
Assessment Area: Nonmetropolitan Ohio							
Geographic Income Level	Bank and Aggregate Loans						Owner Occupied Units %
	Bank		Agg	Bank		Agg	
	#	%	%	\$(000)	%	%	
Home Purchase Loans							
Low	3	1.9	2.1	205	0.8	1.0	2.1
Moderate	54	33.8	18.9	8,377	34.3	19.0	17.2
Middle	103	64.4	78.9	15,819	64.8	79.8	80.6
Upper	0	0.0	0.0	0	0.0	0.0	0.0
Total	160	100.0	100.0	24,401	100.0	100.0	100.0
Refinance Loans							
Low	0	0.0	0.9	0	0.0	0.6	2.1
Moderate	59	28.2	18.8	8,315	27.0	18.8	17.2
Middle	150	71.8	80.0	22,435	73.0	80.4	80.6
Upper	0	0.0	0.0	0	0.0	0.0	0.0
Total	209	100.0	100.0	30,750	100.0	100.0	100.0
Home Improvement Loans							
Low	0	0.0	3.3	0	0.0	0.7	2.1
Moderate	1	25.0	21.7	13	1.8	14.0	17.2
Middle	3	75.0	73.9	720	98.2	84.7	80.6
Upper	0	0.0	0.0	0	0.0	0.0	0.0
Total	4	100.0	100.0	733	100.0	100.0	100.0
Multifamily Loans							Multifamily Units %
Low	0	0.0	0.0	0	0.0	0.0	6.1
Moderate	1	100.0	14.3	305	100.0	13.4	27.9
Middle	0	0.0	85.7	0	0.0	86.6	66.0
Upper	0	0.0	0.0	0	0.0	0.0	0.0
Total	1	100.0	100.0	305	100.0	100.0	100.0
Total HMDA Reportable Loans							Owner Occupied Units %
Low	3	0.8	1.6	205	0.4	0.8	2.1
Moderate	117	30.9	19.0	17,175	30.3	18.8	17.2
Middle	259	68.3	79.2	39,365	69.4	80.2	80.6
Upper	0	0.0	0.0	0	0.0	0.0	0.0
Total	379	100.0	100.0	56,745	100.0	100.0	100.0
Source: 2020 FFIEC Census Data							
2011-2015 U.S. Census Bureau: American Community Survey							
Note: Percentages may not total 100.0 percent due to rounding.							

Distribution of 2020 HMDA Reportable Loans by Income Level of Geography							
Assessment Area: Nonmetropolitan Ohio							
Geographic Income Level	Bank and Aggregate Loans						Owner Occupied Units %
	Bank		Agg	Bank		Agg	
	#	%	%	\$(000)	%	\$%	
Other Purpose LOC							
Low	0	0.0	3.3	0	0.0	2.0	2.1
Moderate	0	0.0	26.7	0	0.0	23.4	17.2
Middle	0	0.0	70.0	0	0.0	74.6	80.6
Upper	0	0.0	0.0	0	0.0	0.0	0.0
Total	0	0.0	100.0	0	0.0	100.0	100.0
Other Purpose Closed/Exempt							
Low	0	0.0	1.4	0	0.0	0.4	2.1
Moderate	2	40.0	26.4	165	29.7	26.2	17.2
Middle	3	60.0	70.8	391	70.3	71.9	80.6
Upper	0	0.0	0.0	0	0.0	0.0	0.0
Total	5	100.0	100.0	556	100.0	100.0	100.0
Purpose Not Applicable							
Low	0	0.0	1.9	0	0.0	1.0	2.1
Moderate	0	0.0	7.5	0	0.0	8.2	17.2
Middle	0	0.0	90.6	0	0.0	90.8	80.6
Upper	0	0.0	0.0	0	0.0	0.0	0.0
Total	0	0.0	100.0	0	0.0	100.0	100.0
Source: 2020 FFIEC Census Data 2011-2015 U.S. Census Bureau: American Community Survey							
Note: Percentages may not total 100.0 percent due to rounding.							

Distribution of 2019 HMDA Reportable Loans by Income Level of Geography							
Assessment Area: Nonmetropolitan Ohio							
Geographic Income Level	Bank and Aggregate Loans						Owner Occupied Units %
	Bank		Agg	Bank		Agg	
	#	%	%	\$(000)	%	%	
Home Purchase Loans							
Low	1	1.0	1.3	44	0.3	0.7	2.1
Moderate	25	23.8	18.0	4,142	27.4	17.7	17.2
Middle	79	75.2	80.7	10,913	72.3	81.6	80.6
Upper	0	0.0	0.0	0	0.0	0.0	0.0
Total	105	100.0	100.0	15,099	100.0	100.0	100.0
Refinance Loans							
Low	0	0.0	0.7	0	0.0	0.6	2.1
Moderate	19	24.7	19.4	2,609	24.6	19.1	17.2
Middle	58	75.3	79.7	7,987	75.4	80.2	80.6
Upper	0	0.0	0.0	0	0.0	0.0	0.0
Total	77	100.0	100.0	10,596	100.0	100.0	100.0
Home Improvement Loans							
Low	0	0.0	2.0	0	0.0	1.1	2.1
Moderate	0	0.0	14.3	0	0.0	24.8	17.2
Middle	5	100.0	83.7	327	100.0	74.1	80.6
Upper	0	0.0	0.0	0	0.0	0.0	0.0
Total	5	100.0	100.0	327	100.0	100.0	100.0
Multifamily Loans							Multifamily Units %
Low	0	0.0	0.0	0	0.0	0.0	6.1
Moderate	0	0.0	55.6	0	0.0	63.3	27.9
Middle	1	100.0	44.4	755	100.0	36.7	66.0
Upper	0	0.0	0.0	0	0.0	0.0	0.0
Total	1	100.0	100.0	755	100.0	100.0	100.0
Total HMDA Reportable Loans							Owner Occupied Units %
Low	1	0.5	1.2	44	0.2	0.7	2.1
Moderate	46	23.4	18.2	6,909	25.0	19.3	17.2
Middle	150	76.1	80.6	20,714	74.9	80.0	80.6
Upper	0	0.0	0.0	0	0.0	0.0	0.0
Total	197	100.0	100.0	27,667	100.0	100.0	100.0
Source: 2019 FFIEC Census Data							
2011-2015 U.S. Census Bureau: American Community Survey							
Note: Percentages may not total 100.0 percent due to rounding.							

Distribution of 2019 HMDA Reportable Loans by Income Level of Geography							
Assessment Area: Nonmetropolitan Ohio							
Geographic Income Level	Bank and Aggregate Loans						Owner Occupied Units %
	Bank		Agg	Bank		Agg	
	#	%	%	\$(000)	%	%	
Other Purpose LOC							
Low	0	0.0	0.0	0	0.0	0.0	2.1
Moderate	0	0.0	8.8	0	0.0	8.5	17.2
Middle	0	0.0	91.2	0	0.0	91.5	80.6
Upper	0	0.0	0.0	0	0.0	0.0	0.0
Total	0	0.0	100.0	0	0.0	100.0	100.0
Other Purpose Closed/Exempt							
Low	0	0.0	2.3	0	0.0	1.7	2.1
Moderate	2	22.2	20.5	158	17.8	24.9	17.2
Middle	7	77.8	77.3	732	82.2	73.4	80.6
Upper	0	0.0	0.0	0	0.0	0.0	0.0
Total	9	100.0	100.0	890	100.0	100.0	100.0
Purpose Not Applicable							
Low	0	0.0	0.0	0	0.0	0.0	2.1
Moderate	0	0.0	4.0	0	0.0	30.2	17.2
Middle	0	0.0	96.0	0	0.0	69.8	80.6
Upper	0	0.0	0.0	0	0.0	0.0	0.0
Total	0	0.0	100.0	0	0.0	100.0	100.0
<i>Source: 2019 FFIEC Census Data 2011-2015 U.S. Census Bureau: American Community Survey</i>							
<i>Note: Percentages may not total 100.0 percent due to rounding.</i>							

Distribution of 2018 HMDA Reportable Loans by Income Level of Geography							
Assessment Area: Nonmetropolitan Ohio							
Geographic Income Level	Bank and Aggregate Loans					Owner Occupied Units %	
	Bank		Agg	Bank			Agg
	#	%	%	\$(000)	%		%
Home Purchase Loans							
Low	2	1.8	1.3	66	0.5	0.6	2.1
Moderate	36	32.7	26.4	4,554	34.2	26.1	25.5
Middle	72	65.5	72.3	8,694	65.3	73.3	72.3
Upper	0	0.0	0.0	0	0.0	0.0	0.0
Total	110	100.0	100.0	13,314	100.0	100.0	100.0
Refinance Loans							
Low	1	1.5	1.1	17	0.2	0.4	2.1
Moderate	23	35.4	26.2	2,373	31.4	25.4	25.5
Middle	41	63.1	72.4	5,173	68.4	74.1	72.3
Upper	0	0.0	0.0	0	0.0	0.0	0.0
Total	65	100.0	100.0	7,563	100.0	100.0	100.0
Home Improvement Loans							
Low	0	0.0	3.9	0	0.0	2.3	2.1
Moderate	2	40.0	25.5	75	32.3	27.8	25.5
Middle	3	60.0	70.6	157	67.7	69.9	72.3
Upper	0	0.0	0.0	0	0.0	0.0	0.0
Total	5	100.0	100.0	232	100.0	100.0	100.0
Multifamily Loans							Multifamily Units %
Low	0	0.0	0.0	0	0.0	0.0	6.1
Moderate	0	0.0	0.0	0	0.0	0.0	28.3
Middle	1	100.0	100.0	519	100.0	100.0	65.6
Upper	0	0.0	0.0	0	0.0	0.0	0.0
Total	1	100.0	100.0	519	100.0	100.0	100.0
Total HMDA Reportable Loans							Owner Occupied Units %
Low	3	1.6	1.3	83	0.4	0.6	2.1
Moderate	61	32.4	25.8	7,002	31.5	25.6	25.5
Middle	124	66.0	72.9	15,155	68.1	73.8	72.3
Upper	0	0.0	0.0	0	0.0	0.0	0.0
Total	188	100.0	100.0	22,240	100.0	100.0	100.0
Source: 2018 FFIEC Census Data							
2011-2015 U.S. Census Bureau: American Community Survey							
Note: Percentages may not total 100.0 percent due to rounding.							

Distribution of 2018 HMDA Reportable Loans by Income Level of Geography							
Assessment Area: Nonmetropolitan Ohio							
Geographic Income Level	Bank and Aggregate Loans						Owner Occupied Units %
	Bank		Agg	Bank		Agg	
	#	%	%	\$(000)	%	\$%	
Other Purpose LOC							
Low	0	0.0	0.0	0	0.0	0.0	2.1
Moderate	0	0.0	20.5	0	0.0	22.8	25.5
Middle	0	0.0	79.5	0	0.0	77.2	72.3
Upper	0	0.0	0.0	0	0.0	0.0	0.0
Total	0	0.0	100.0	0	0.0	100.0	100.0
Other Purpose Closed/Exempt							
Low	0	0.0	0.0	0	0.0	0.0	2.1
Moderate	0	0.0	20.8	0	0.0	16.7	25.5
Middle	7	100.0	77.8	612	100.0	82.8	72.3
Upper	0	0.0	0.0	0	0.0	0.0	0.0
Total	7	100.0	100.0	612	100.0	100.0	100.0
Purpose Not Applicable							
Low	0	0.0	0.0	0	0.0	0.0	2.1
Moderate	0	0.0	22.7	0	0.0	27.9	25.5
Middle	0	0.0	77.3	0	0.0	72.1	72.3
Upper	0	0.0	0.0	0	0.0	0.0	0.0
Total	0	0.0	100.0	0	0.0	100.0	100.0
Source: 2018 FFIEC Census Data 2011-2015 U.S. Census Bureau: American Community Survey							
Note: Percentages may not total 100.0 percent due to rounding.							

Distribution of January 1, 2021 – June 30, 2021 HMDA Reportable Loans by Borrower Income Level					
Assessment Area: Huntington-Ashland, WV-KY-OH #26580					
Geographic Income Level	Bank Loans*				Owner Occupied Units %
	#	%	\$(000)	%	
Low	0	0.0	0	0.0	24.0
Moderate	3	12.5	311	3.7	15.7
Middle	2	8.3	237	2.8	19.3
Upper	15	62.5	4,597	54.0	41.0
Unknown	4	16.7	3,371	39.6	0.0
Total	24	100.0	8,516	100.0	100.0
Source: 2021 FFIEC Census Data 2011-2015 U.S. Census Bureau: American Community Survey					
Note: Percentages may not total 100.0 percent due to rounding. *Aggregate data is not currently available.					

Distribution of 2020 HMDA Reportable Loans by Borrower Income Level							
Assessment Area: Huntington-Ashland, WV-KY-OH MSA #26580							
Borrower Income Level	Bank and Aggregate Loans						Families by Family Income %
	Bank		Agg	Bank		Agg	
	#	#%	#%	\$(000)	%	%	
Home Purchase Loans							
Low	2	5.0	8.4	145	1.6	4.5	24.0
Moderate	4	10.0	22.0	404	4.5	15.6	15.7
Middle	5	12.5	22.7	692	7.7	20.4	19.3
Upper	26	65.0	39.3	6,210	69.5	52.4	41.0
Unknown	3	7.5	7.5	1,488	16.6	7.1	0.0
Total	40	100.0	100.0	8,939	100.0	100.0	100.0
Refinance Loans							
Low	0	0.0	3.6	0	0.0	1.4	24.0
Moderate	4	7.5	9.9	340	3.4	5.9	15.7
Middle	16	30.2	17.3	2,185	21.6	12.7	19.3
Upper	31	58.5	52.0	6,269	62.1	62.0	41.0
Unknown	2	3.8	17.2	1,307	12.9	18.0	0.0
Total	53	100.0	100.0	10,101	100.0	100.0	100.0
Home Improvement Loans							
Low	0	0.0	2.5	0	0.0	2.9	24.0
Moderate	0	0.0	11.1	0	0.0	8.0	15.7
Middle	0	0.0	18.5	0	0.0	17.3	19.3
Upper	0	0.0	64.2	0	0.0	68.1	41.0
Unknown	0	0.0	3.7	0	0.0	3.7	0.0
Total	0	0.0	100.0	0	0.0	100.0	100.0
Total HMDA Reportable Loans							
Low	2	2.0	5.7	145	0.6	2.4	24.0
Moderate	8	8.2	15.4	744	3.1	8.8	15.7
Middle	21	21.4	19.6	2,877	12.1	13.7	19.3
Upper	58	59.2	45.0	12,761	53.5	48.1	41.0
Unknown	9	9.2	14.3	7,322	30.7	27.0	0.0
Total	98	100.0	100.0	23,849	100.0	100.0	100.0
Source: 2020 FFIEC Census Data							
2011-2015 U.S. Census Bureau: American Community Survey							
Note: Percentages may not total 100.0 percent due to rounding. Multifamily loans are not included in the borrower distribution analysis.							

Distribution of 2020 HMDA Reportable Loans by Borrower Income Level Assessment Area: Huntington-Ashland, WV-KY-OH MSA #26580							
Borrower Income Level	Bank and Aggregate Loans						Families by Family Income %
	Bank		Agg	Bank		Agg	
	#	%	%	\$(000)	%	%	
Other Purpose LOC							
Low	0	0.0	2.1	0	0.0	1.3	24.0
Moderate	0	0.0	10.6	0	0.0	7.8	15.7
Middle	0	0.0	27.7	0	0.0	13.6	19.3
Upper	0	0.0	59.6	0	0.0	77.4	41.0
Unknown	0	0.0	0.0	0	0.0	0.0	0.0
Total	0	0.0	100.0	0	0.0	100.0	100.0
Other Purpose Closed/Exempt							
Low	0	0.0	6.7	0	0.0	1.9	24.0
Moderate	0	0.0	0.0	0	0.0	0.0	15.7
Middle	0	0.0	20.0	0	0.0	13.3	19.3
Upper	0	0.0	73.3	0	0.0	84.8	41.0
Unknown	0	0.0	0.0	0	0.0	0.0	0.0
Total	0	0.0	100.0	0	0.0	100.0	100.0
Purpose Not Applicable							
Low	0	0.0	0.0	0	0.0	0.0	24.0
Moderate	0	0.0	0.0	0	0.0	0.0	15.7
Middle	0	0.0	0.0	0	0.0	0.0	19.3
Upper	0	0.0	0.0	0	0.0	0.0	41.0
Unknown	0	0.0	100.0	0	0.0	100.0	0.0
Total	0	0.0	100.0	0	0.0	100.0	100.0
Source: 2020 FFIEC Census Data 2011-2015 U.S. Census Bureau: American Community Survey Note: Percentages may not total 100.0 percent due to rounding.							

Distribution of 2019 HMDA Reportable Loans by Borrower Income Level							
Assessment Area: Huntington-Ashland, WV-KY-OH MSA #26580							
Borrower Income Level	Bank and Aggregate Loans						Families by Family Income %
	Bank		Agg	Bank		Agg	
	#	%	%	\$(000)	%	%	
Home Purchase Loans							
Low	0	0.0	6.2	0	0.0	3.2	24.0
Moderate	2	11.1	17.2	250	6.6	11.8	15.7
Middle	2	11.1	25.7	327	8.6	22.2	19.3
Upper	12	66.7	41.0	2,982	78.9	54.2	41.0
Unknown	2	11.1	9.8	222	5.9	8.8	0.0
Total	18	100.0	100.0	3,781	100.0	100.0	100.0
Refinance Loans							
Low	0	0.0	5.8	0	0.0	2.7	24.0
Moderate	3	15.0	14.8	250	6.3	8.6	15.7
Middle	1	5.0	17.2	64	1.6	12.0	19.3
Upper	15	75.0	47.1	3,472	87.8	59.2	41.0
Unknown	1	5.0	15.1	168	4.2	17.5	0.0
Total	20	100.0	100.0	3,954	100.0	100.0	100.0
Home Improvement Loans							
Low	0	0.0	12.0	0	0.0	8.2	24.0
Moderate	0	0.0	9.3	0	0.0	6.1	15.7
Middle	0	0.0	23.1	0	0.0	14.1	19.3
Upper	0	0.0	54.6	0	0.0	71.0	41.0
Unknown	0	0.0	0.9	0	0.0	0.5	0.0
Total	0	0.0	100.0	0	0.0	100.0	100.0
Total HMDA Reportable Loans							
Low	0	0.0	6.3	0	0.0	2.9	24.0
Moderate	6	15.0	15.2	580	7.2	9.4	15.7
Middle	3	7.5	21.7	391	4.8	16.4	19.3
Upper	27	67.5	43.5	6,454	79.7	51.7	41.0
Unknown	4	10.0	13.2	674	8.3	19.6	0.0
Total	40	100.0	100.0	8,099	100.0	100.0	100.0
Source: 2019 FFIEC Census Data							
2011-2015 U.S. Census Bureau: American Community Survey							
Note: Percentages may not total 100.0 percent due to rounding. Multifamily loans are not included in the borrower distribution analysis.							

Distribution of 2018 HMDA Reportable Loans by Borrower Income Level							
Assessment Area: Huntington-Ashland, WV-KY-OH MSA #26580							
Borrower Income Level	Bank and Aggregate Loans						Families by Family Income %
	Bank		Agg	Bank		Agg	
	#	%	%	\$(000)	%	%	
Low	1	5.6	6.7	80	2.4	3.6	24.2
Moderate	1	5.6	14.9	90	2.7	9.0	15.9
Middle	3	16.7	23.0	271	8.2	17.9	19.3
Upper	12	66.7	42.6	2,593	78.1	51.9	40.6
Unknown	1	5.6	12.8	285	8.6	17.6	0.0
Total	18	100.0	100.0	3,319	100.0	100.0	100.0
Source: 2018 FFIEC Census Data 2011-2015 U.S. Census Bureau: American Community Survey							
Note: Percentages may not total 100.0 percent due to rounding. Multifamily loans are not included in the borrower distribution analysis.							

Distribution of 2019 HMDA Reportable Loans by Borrower Income Level							
Assessment Area: Huntington-Ashland, WV-KY-OH MSA #26580							
Borrower Income Level	Bank and Aggregate Loans						Families by Family Income %
	Bank		Agg	Bank		Agg	
	#	%	%	\$(000)	%	%	
Other Purpose LOC							
Low	0	0.0	8.9	0	0.0	5.0	24.0
Moderate	0	0.0	14.3	0	0.0	11.0	15.7
Middle	0	0.0	10.7	0	0.0	9.9	19.3
Upper	0	0.0	62.5	0	0.0	71.1	41.0
Unknown	0	0.0	3.6	0	0.0	3.0	0.0
Total	0	0.0	100.0	0	0.0	100.0	100.0
Other Purpose Closed/Exempt							
Low	0	0.0	5.7	0	0.0	2.2	24.0
Moderate	1	100.0	8.6	80	100.0	2.9	15.7
Middle	0	0.0	22.9	0	0.0	10.8	19.3
Upper	0	0.0	60.0	0	0.0	82.7	41.0
Unknown	0	0.0	2.9	0	0.0	1.4	0.0
Total	1	100.0	100.0	80	100.0	100.0	100.0
Purpose Not Applicable							
Low	0	0.0	0.0	0	0.0	0.0	24.0
Moderate	0	0.0	2.5	0	0.0	2.1	15.7
Middle	0	0.0	2.5	0	0.0	3.0	19.3
Upper	0	0.0	0.0	0	0.0	0.0	41.0
Unknown	0	0.0	95.0	0	0.0	94.9	0.0
Total	0	0.0	100.0	0	0.0	100.0	100.0
Source: 2019 FFIEC Census Data 2011-2015 U.S. Census Bureau: American Community Survey							
Note: Percentages may not total 100.0 percent due to rounding.							

Distribution of January 1, 2021 – June 30, 2021					
HMDA Reportable Loans by Income Level of Geography					
Assessment Area: Huntington-Ashland, WV-KY-OH #26580					
Geographic Income Level	Bank Loans*				Owner Occupied Units %
	#	#%	\$(000)	\$%	
Low	1	4.2	270	3.2	7.3
Moderate	1	4.2	51	0.6	9.5
Middle	13	54.2	5,794	68.0	52.5
Upper	8	33.3	1,722	20.2	30.7
Total	24	100.0	8,516	100.0	100.0
<i>Source: 2021 FFIEC Census Data 2011-2015 U.S. Census Bureau: American Community Survey</i>					
<i>Note: Percentages may not total 100.0 percent due to rounding. *Aggregate data is not currently available.</i>					

Distribution of 2020 HMDA Reportable Loans by Income Level of Geography							
Assessment Area: Huntington-Ashland, WV-KY-OH MSA #26580							
Geographic Income Level	Bank and Aggregate Loans						Owner Occupied Units %
	Bank		Agg	Bank		Agg	
	#	%	%	\$(000)	%	\$%	
Home Purchase Loans							
Low	2	5.0	4.2	1,304	14.6	3.0	7.3
Moderate	0	0.0	6.1	0	0.0	3.0	9.5
Middle	30	75.0	55.2	5,730	64.1	60.2	52.5
Upper	8	20.0	34.4	1,905	21.3	33.9	30.7
Total	40	100.0	100.0	8,939	100.0	100.0	100.0
Refinance Loans							
Low	1	1.9	2.0	118	1.2	1.9	7.3
Moderate	0	0.0	3.4	0	0.0	1.6	9.5
Middle	39	73.6	59.2	7,922	78.4	58.8	52.5
Upper	13	24.5	35.3	2,061	20.4	37.6	30.7
Total	53	100.0	100.0	10,101	100.0	100.0	100.0
Home Improvement Loans							
Low	0	0.0	7.4	0	0.0	6.1	7.3
Moderate	0	0.0	4.9	0	0.0	3.3	9.5
Middle	0	0.0	54.3	0	0.0	43.5	52.5
Upper	0	0.0	33.3	0	0.0	47.1	30.7
Total	0	0.0	100.0	0	0.0	100.0	100.0
Multifamily Loans							Multifamily Units %
Low	3	60.0	25.0	3,146	65.4	13.7	
Moderate	0	0.0	16.7	0	0.0	3.4	14.9
Middle	2	40.0	27.8	1,663	34.6	45.5	35.3
Upper	0	0.0	19.4	0	0.0	32.1	12.8
Total	5	100.0	100.0	4,809	100.0	100.0	100.0
Total HMDA Reportable Loans							Owner Occupied Units %
Low	6	6.1	3.9	4,568	19.2	4.4	
Moderate	0	0.0	5.1	0	0.0	2.5	9.5
Middle	71	72.4	56.6	15,315	64.2	57.3	52.5
Upper	21	21.4	34.3	3,966	16.6	35.0	30.7
Total	98	100.0	100.0	23,849	100.0	100.0	100.0
Source: 2020 FFIEC Census Data							
2011-2015 U.S. Census Bureau: American Community Survey							
Note: Percentages may not total 100.0 percent due to rounding.							

Distribution of 2020 HMDA Reportable Loans by Income Level of Geography							
Assessment Area: Huntington-Ashland, WV-KY-OH MSA #26580							
Geographic Income Level	Bank and Aggregate Loans						Owner Occupied Units %
	Bank		Agg	Bank		Agg	
	#	#%	#%	\$(000)	%	%	
Other Purpose LOC							
Low	0	0.0	4.3	0	0.0	2.4	7.3
Moderate	0	0.0	6.4	0	0.0	2.3	9.5
Middle	0	0.0	57.4	0	0.0	72.3	52.5
Upper	0	0.0	31.9	0	0.0	23.0	30.7
Total	0	0.0	100.0	0	0.0	100.0	100.0
Other Purpose Closed/Exempt							
Low	0	0.0	20.0	0	0.0	8.4	7.3
Moderate	0	0.0	0.0	0	0.0	0.0	9.5
Middle	0	0.0	73.3	0	0.0	87.6	52.5
Upper	0	0.0	6.7	0	0.0	4.0	30.7
Total	0	0.0	100.0	0	0.0	100.0	100.0
Purpose Not Applicable							
Low	0	0.0	8.0	0	0.0	5.4	7.3
Moderate	0	0.0	6.0	0	0.0	3.4	9.5
Middle	0	0.0	52.0	0	0.0	54.6	52.5
Upper	0	0.0	34.0	0	0.0	36.6	30.7
Total	0	0.0	100.0	0	0.0	100.0	100.0
<i>Source: 2020 FFIEC Census Data 2011-2015 U.S. Census Bureau: American Community Survey</i>							
<i>Note: Percentages may not total 100.0 percent due to rounding.</i>							

Distribution of 2019 HMDA Reportable Loans by Income Level of Geography							
Assessment Area: Huntington-Ashland, WV-KY-OH MSA #26580							
Geographic Income Level	Bank and Aggregate Loans						Owner Occupied Units %
	Bank		Agg	Bank		Agg	
	#	%	%	\$(000)	\$%	\$%	
Home Purchase Loans							
Low	0	0.0	3.1	0	0.0	1.3	7.3
Moderate	2	11.1	4.4	144	3.8	2.2	9.5
Middle	13	72.2	58.2	3,202	84.7	62.1	52.5
Upper	3	16.7	34.4	435	11.5	34.5	30.7
Total	18	100.0	100.0	3,781	100.0	100.0	100.0
Refinance Loans							
Low	0	0.0	3.3	0	0.0	2.6	7.3
Moderate	1	5.0	5.3	60	1.5	2.7	9.5
Middle	16	80.0	54.8	2,868	72.5	58.7	52.5
Upper	3	15.0	36.0	1,026	25.9	35.5	30.7
Total	20	100.0	100.0	3,954	100.0	100.0	100.0
Home Improvement Loans							
Low	0	0.0	2.8	0	0.0	0.7	7.3
Moderate	0	0.0	5.6	0	0.0	2.5	9.5
Middle	0	0.0	50.9	0	0.0	37.8	52.5
Upper	0	0.0	40.7	0	0.0	59.0	30.7
Total	0	0.0	100.0	0	0.0	100.0	100.0
Multifamily Loans							Multifamily Units %
Low	0	0.0	31.6	0	0.0	9.9	
Moderate	0	0.0	5.3	0	0.0	1.3	14.9
Middle	1	100.0	36.8	284	100.0	25.6	35.3
Upper	0	0.0	15.8	0	0.0	56.9	12.8
Total	1	100.0	100.0	284	100.0	100.0	100.0
Total HMDA Reportable Loans							Owner Occupied Units %
Low	0	0.0	3.7	0	0.0	2.4	
Moderate	3	7.5	4.8	204	2.5	2.3	9.5
Middle	30	75.0	56.2	6,354	78.5	56.6	52.5
Upper	7	17.5	35.0	1,541	19.0	38.0	30.7
Total	40	100.0	100.0	8,099	100.0	100.0	100.0
Source: 2019 FFIEC Census Data							
2011-2015 U.S. Census Bureau: American Community Survey							
Note: Percentages may not total 100.0 percent due to rounding.							

Distribution of 2019 HMDA Reportable Loans by Income Level of Geography							
Assessment Area: Huntington-Ashland, WV-KY-OH MSA #26580							
Geographic Income Level	Bank and Aggregate Loans						Owner Occupied Units %
	Bank		Agg	Bank		Agg	
	#	%	%	\$(000)	%	%	
Other Purpose LOC							
Low	0	0.0	7.1	0	0.0	2.8	7.3
Moderate	0	0.0	0.0	0	0.0	0.0	9.5
Middle	0	0.0	66.1	0	0.0	59.7	52.5
Upper	0	0.0	26.8	0	0.0	37.5	30.7
Total	0	0.0	100.0	0	0.0	100.0	100.0
Other Purpose Closed/Exempt							
Low	0	0.0	0.0	0	0.0	0.0	7.3
Moderate	0	0.0	14.3	0	0.0	5.1	9.5
Middle	0	0.0	42.9	0	0.0	22.9	52.5
Upper	1	100.0	42.9	80	100.0	72.0	30.7
Total	1	100.0	100.0	80	100.0	100.0	100.0
Purpose Not Applicable							
Low	0	0.0	12.5	0	0.0	6.7	7.3
Moderate	0	0.0	7.5	0	0.0	3.2	9.5
Middle	0	0.0	47.5	0	0.0	50.3	52.5
Upper	0	0.0	32.5	0	0.0	39.8	30.7
Total	0	0.0	100.0	0	0.0	100.0	100.0
Source: 2019 FFIEC Census Data							
2011-2015 U.S. Census Bureau: American Community Survey							
Note: Percentages may not total 100.0 percent due to rounding.							

Distribution of 2018 HMDA Reportable Loans by Income Level of Geography							
Assessment Area: Huntington-Ashland, WV-KY-MSA #26580							
Geographic Income Level	Bank and Aggregate Loans						Owner Occupied Units %
	Bank		Agg	Bank		Agg	
	#	%	%	\$(000)	%	%	
Low	0	0.0	5.0	0	0.0	4.6	7.3
Moderate	0	0.0	6.0	0	0.0	3.2	9.5
Middle	12	66.7	55.8	2,475	74.6	55.4	52.5
Upper	6	33.3	32.1	844	25.4	34.1	30.7
Total	18	100.0	100.0	3,319	100.0	100.0	100.0
Source: 2018 FFIEC Census Data							
2011-2015 U.S. Census Bureau: American Community Survey							
Note: Percentages may not total 100.0 percent due to rounding.							

Distribution of January 1, 2021 – June 30, 2021 HMDA Reportable Loans by Borrower Income Level Assessment Area: Nonmetropolitan West Virginia					
Borrower Income Level	Bank Loans*				Families by Family Income %
	#	#%	\$(000)	%	
Home Purchase Loans					
Low	0	0.0	0	0.0	22.1
Moderate	1	4.2	75	2.1	19.5
Middle	6	25.0	672	19.1	21.9
Upper	13	54.2	2,470	70.3	36.5
Unknown	4	16.7	299	8.5	0.0
Total	24	100.0	3,516	100.0	100.0
Refinance Loans					
Low	0	0.0	0	0.0	22.1
Moderate	1	14.3	67	7.8	19.5
Middle	1	14.3	92	10.6	21.9
Upper	2	28.6	442	51.0	36.5
Unknown	3	42.9	265	30.6	0.0
Total	7	100.0	866	100.0	100.0
Home Improvement Loans					
Low	0	0.0	0	0.0	22.1
Moderate	0	0.0	0	0.0	19.5
Middle	0	0.0	0	0.0	21.9
Upper	0	0.0	0	0.0	36.5
Unknown	0	0.0	0	0.0	0.0
Total	0	0.0	0	0.0	100.0
Total HMDA Reportable Loans					
Low	0	0.0	0	0.0	22.1
Moderate	2	6.1	142	3.0	19.5
Middle	7	21.2	764	16.2	21.9
Upper	15	45.5	2,912	61.6	36.5
Unknown	9	27.3	911	19.3	0.0
Total	33	100.0	4,729	100.0	100.0
Source: 2021 FFIEC Census Data 2011-2015 U.S. Census Bureau: American Community Survey Note: Percentages may not total 100.0 percent due to rounding. Multifamily loans are not included in the borrower distribution analysis. *Aggregate data is not currently available.					

Distribution of January 1, 2021 – June 30, 2021 HMDA Reportable Loans by Borrower Income Level Assessment Area: Nonmetropolitan West Virginia					
Borrower Income Level	Bank Loans*				Families by Family Income %
	#	#%	\$(000)	%	
Other Purpose LOC					
Low	0	0.0	0	0.0	22.1
Moderate	0	0.0	0	0.0	19.5
Middle	0	0.0	0	0.0	21.9
Upper	0	0.0	0	0.0	36.5
Unknown	0	0.0	0	0.0	0.0
Total	0	0.0	0	0.0	100.0
Other Purpose Closed/Exempt					
Low	0	0.0	0	0.0	22.1
Moderate	0	0.0	0	0.0	19.5
Middle	0	0.0	0	0.0	21.9
Upper	0	0.0	0	0.0	36.5
Unknown	0	0.0	0	0.0	0.0
Total	0	0.0	0	0.0	100.0
Purpose Not Applicable					
Low	0	0.0	0	0.0	22.1
Moderate	0	0.0	0	0.0	19.5
Middle	0	0.0	0	0.0	21.9
Upper	0	0.0	0	0.0	36.5
Unknown	0	0.0	0	0.0	0.0
Total	0	0.0	0	0.0	100.0
Source: 2021 FFIEC Census Data 2011-2015 U.S. Census Bureau: American Community Survey Note: Percentages may not total 100.0 percent due to rounding. Multifamily loans are not included in the borrower distribution analysis. *Aggregate data is not currently available.					

Distribution of January 1, 2021 – June 30, 2021 HMDA Reportable Loans by Income Level of Geography Assessment Area: Nonmetropolitan West Virginia					
Geographic Income Level	Bank Loans*				Owner Occupied Units %
	#	#%	\$(000)	%	
Home Purchase Loans					
Low	0	0.0	0	0.0	0.0
Moderate	0	0.0	0	0.0	0.0
Middle	24	100.0	3,516	100.0	100.0
Upper	0	0.0	0	0.0	0.0
Total	24	100.0	3,516	100.0	100.0
Refinance Loans					
Low	0	0.0	0	0.0	0.0
Moderate	0	0.0	0	0.0	0.0
Middle	7	100.0	866	100.0	100.0
Upper	0	0.0	0	0.0	0.0
Total	7	100.0	866	100.0	100.0
Home Improvement Loans					
Low	0	0.0	0	0.0	0.0
Moderate	0	0.0	0	0.0	0.0
Middle	0	0.0	0	0.0	100.0
Upper	0	0.0	0	0.0	0.0
Total	0	0.0	0	0.0	100.0
Multifamily Loans					Multifamily Units %
Low	0	0.0	0	0.0	0.0
Moderate	0	0.0	0	0.0	0.0
Middle	2	100.0	347	100.0	100.0
Upper	0	0.0	0	0.0	0.0
Total	2	100.0	347	100.0	100.0
Total HMDA Reportable Loans					Owner Occupied Units %
Low	0	0.0	0	0.0	0.0
Moderate	0	0.0	0	0.0	0.0
Middle	33	100.0	4,729	100.0	100.0
Upper	0	0.0	0	0.0	0.0
Total	33	100.0	4,729	100.0	100.0
Source: 2021 FFIEC Census Data 2011-2015 U.S. Census Bureau: American Community Survey					
Note: Percentages may not total 100.0 percent due to rounding. *Aggregate data is not currently available.					

Distribution of January 1, 2021 – June 30, 2021 HMDA Reportable Loans by Income Level of Geography Assessment Area: Nonmetropolitan West Virginia					
Geographic Income Level	Bank Loans*				Owner Occupied Units %
	#	%	\$(000)	%	
Other Purpose LOC					
Low	0	0.0	0	0.0	0.0
Moderate	0	0.0	0	0.0	0.0
Middle	0	0.0	0	0.0	100.0
Upper	0	0.0	0	0.0	0.0
Total	0	0.0	0	0.0	100.0
Other Purpose Closed/Exempt					
Low	0	0.0	0	0.0	0.0
Moderate	0	0.0	0	0.0	0.0
Middle	0	0.0	0	0.0	100.0
Upper	0	0.0	0	0.0	0.0
Total	0	0.0	0	0.0	100.0
Purpose Not Applicable					
Low	0	0.0	0	0.0	0.0
Moderate	0	0.0	0	0.0	0.0
Middle	0	0.0	0	0.0	100.0
Upper	0	0.0	0	0.0	0.0
Total	0	0.0	0	0.0	100.0
Source: 2021 FFIEC Census Data 2011-2015 U.S. Census Bureau: American Community Survey					
Note: Percentages may not total 100.0 percent due to rounding. *Aggregate data is not currently available.					

Distribution of 2020 HMDA Reportable Loans by Borrower Income Level							
Assessment Area: Nonmetropolitan West Virginia							
Borrower Income Level	Bank and Aggregate Loans						Families by Family Income %
	Bank		Agg	Bank		Agg	
	#	#%	#%	\$(000)	%	%	
Home Purchase Loans							
Low	3	11.1	5.2	182	5.4	2.8	22.1
Moderate	3	11.1	19.4	158	4.7	14.8	19.5
Middle	8	29.6	26.0	682	20.2	23.4	21.9
Upper	12	44.4	35.3	2,181	64.5	44.9	36.5
Unknown	1	3.7	14.2	176	5.2	14.0	0.0
Total	27	100.0	100.0	3,379	100.0	100.0	100.0
Refinance Loans							
Low	1	1.8	5.1	31	0.4	2.2	22.1
Moderate	3	5.5	7.2	213	2.9	4.4	19.5
Middle	12	21.8	22.9	1,313	17.9	18.4	21.9
Upper	39	70.9	53.4	5,766	78.7	63.3	36.5
Unknown	0	0.0	11.4	0	0.0	11.8	0.0
Total	55	100.0	100.0	7,323	100.0	100.0	100.0
Home Improvement Loans							
Low	0	0.0	10.5	0	0.0	2.8	22.1
Moderate	0	0.0	5.3	0	0.0	4.6	19.5
Middle	0	0.0	42.1	0	0.0	39.8	21.9
Upper	0	0.0	36.8	0	0.0	36.4	36.5
Unknown	0	0.0	5.3	0	0.0	16.4	0.0
Total	0	0.0	100.0	0	0.0	100.0	100.0
Total HMDA Reportable Loans							
Low	4	4.8	5.1	213	2.0	2.4	22.1
Moderate	6	7.2	13.0	371	3.4	9.2	19.5
Middle	20	24.1	24.7	1,995	18.6	21.0	21.9
Upper	52	62.7	42.4	7,999	74.4	52.8	36.5
Unknown	1	1.2	14.9	176	1.6	14.5	0.0
Total	83	100.0	100.0	10,754	100.0	100.0	100.0
<i>Source: 2020 FFIEC Census Data 2011-2015 U.S. Census Bureau: American Community Survey</i>							
<i>Note: Percentages may not total 100.0 percent due to rounding. Multifamily loans are not included in the borrower distribution analysis.</i>							

Distribution of 2020 HMDA Reportable Loans by Borrower Income Level							
Assessment Area: Nonmetropolitan West Virginia							
Borrower Income Level	Bank and Aggregate Loans						Families by Family Income %
	Bank		Agg	Bank		Agg	
	#	%	%	\$(000)	%	%	
Other Purpose LOC							
Low	0	0.0	0.0	0	0.0	0.0	22.1
Moderate	0	0.0	0.0	0	0.0	0.0	19.5
Middle	0	0.0	66.7	0	0.0	77.0	21.9
Upper	0	0.0	33.3	0	0.0	23.0	36.5
Unknown	0	0.0	0.0	0	0.0	0.0	0.0
Total	0	0.0	100.0	0	0.0	100.0	100.0
Other Purpose Closed/Exempt							
Low	0	0.0	0.0	0	0.0	0.0	22.1
Moderate	0	0.0	0.0	0	0.0	0.0	19.5
Middle	0	0.0	0.0	0	0.0	0.0	21.9
Upper	1	100.0	83.3	52	100.0	72.1	36.5
Unknown	0	0.0	16.7	0	0.0	27.9	0.0
Total	1	100.0	100.0	52	100.0	100.0	100.0
Purpose Not Applicable							
Low	0	0.0	0.0	0	0.0	0.0	22.1
Moderate	0	0.0	0.0	0	0.0	0.0	19.5
Middle	0	0.0	0.0	0	0.0	0.0	21.9
Upper	0	0.0	0.0	0	0.0	0.0	36.5
Unknown	0	0.0	100.0	0	0.0	100.0	0.0
Total	0	0.0	100.0	0	0.0	100.0	100.0
<i>Source: 2020 FFIEC Census Data 2011-2015 U.S. Census Bureau: American Community Survey</i>							
<i>Note: Percentages may not total 100.0 percent due to rounding.</i>							

Distribution of 2020 HMDA Reportable Loans by Income Level of Geography							
Assessment Area: Nonmetropolitan West Virginia							
Geographic Income Level	Bank and Aggregate Loans						Owner Occupied Units %
	Bank		Agg	Bank		Agg	
	#	%	%	\$(000)	%	\$%	
Home Purchase Loans							
Low	0	0.0	0.0	0	0.0	0.0	0.0
Moderate	0	0.0	0.0	0	0.0	0.0	0.0
Middle	27	100.0	100.0	3,379	100.0	100.0	100.0
Upper	0	0.0	0.0	0	0.0	0.0	0.0
Total	27	100.0	100.0	3,379	100.0	100.0	100.0
Refinance Loans							
Low	0	0.0	0.0	0	0.0	0.0	0.0
Moderate	0	0.0	0.0	0	0.0	0.0	0.0
Middle	55	100.0	100.0	7,323	100.0	100.0	100.0
Upper	0	0.0	0.0	0	0.0	0.0	0.0
Total	55	100.0	100.0	7,323	100.0	100.0	100.0
Home Improvement Loans							
Low	0	0.0	0.0	0	0.0	0.0	0.0
Moderate	0	0.0	0.0	0	0.0	0.0	0.0
Middle	0	0.0	100.0	0	0.0	100.0	100.0
Upper	0	0.0	0.0	0	0.0	0.0	0.0
Total	0	0.0	100.0	0	0.0	100.0	100.0
Multifamily Loans							Multifamily Units %
Low	0	0.0	0.0	0	0.0	0.0	
Moderate	0	0.0	0.0	0	0.0	0.0	0.0
Middle	0	0.0	0.0	0	0.0	0.0	100.0
Upper	0	0.0	0.0	0	0.0	0.0	0.0
Total	0	0.0	0.0	0	0.0	0.0	100.0
Total HMDA Reportable Loans							Owner Occupied Units %
Low	0	0.0	0.0	0	0.0	0.0	
Moderate	0	0.0	0.0	0	0.0	0.0	0.0
Middle	83	100.0	100.0	10,754	100.0	100.0	100.0
Upper	0	0.0	0.0	0	0.0	0.0	0.0
Total	83	100.0	100.0	10,754	100.0	100.0	100.0
Source: 2020 FFIEC Census Data							
2011-2015 U.S. Census Bureau: American Community Survey							
Note: Percentages may not total 100.0 percent due to rounding.							

Distribution of 2020 HMDA Reportable Loans by Income Level of Geography							
Assessment Area: Nonmetropolitan West Virginia							
Geographic Income Level	Bank and Aggregate Loans						Owner Occupied Units %
	Bank		Agg	Bank		Agg	
	#	#%	#%	\$(000)	\$%	\$%	
Other Purpose LOC							
Low	0	0.0	0.0	0	0.0	0.0	0.0
Moderate	0	0.0	0.0	0	0.0	0.0	0.0
Middle	0	0.0	100.0	0	0.0	100.0	100.0
Upper	0	0.0	0.0	0	0.0	0.0	0.0
Total	0	0.0	100.0	0	0.0	100.0	100.0
Other Purpose Closed/Exempt							
Low	0	0.0	0.0	0	0.0	0.0	0.0
Moderate	0	0.0	0.0	0	0.0	0.0	0.0
Middle	1	100.0	100.0	52	100.0	100.0	100.0
Upper	0	0.0	0.0	0	0.0	0.0	0.0
Total	1	100.0	100.0	52	100.0	100.0	100.0
Purpose Not Applicable							
Low	0	0.0	0.0	0	0.0	0.0	0.0
Moderate	0	0.0	0.0	0	0.0	0.0	0.0
Middle	0	0.0	100.0	0	0.0	100.0	100.0
Upper	0	0.0	0.0	0	0.0	0.0	0.0
Total	0	0.0	100.0	0	0.0	100.0	100.0
<i>Source: 2020 FFIEC Census Data 2011-2015 U.S. Census Bureau: American Community Survey</i>							
<i>Note: Percentages may not total 100.0 percent due to rounding.</i>							

Distribution of 2019 HMDA Reportable Loans by Borrower Income Level							
Assessment Area: Nonmetropolitan West Virginia							
Borrower Income Level	Bank and Aggregate Loans						Families by Family Income %
	Bank		Agg	Bank		Agg	
	#	#%	#%	\$(000)	%	\$%	
Home Purchase Loans							
Low	1	4.5	4.9	24	0.7	2.6	22.1
Moderate	1	4.5	16.3	107	2.9	11.6	19.5
Middle	4	18.2	22.0	423	11.6	20.1	21.9
Upper	12	54.5	42.3	2,494	68.3	50.6	36.5
Unknown	4	18.2	14.6	606	16.6	15.1	0.0
Total	22	100.0	100.0	3,654	100.0	100.0	100.0
Refinance Loans							
Low	1	6.3	5.5	52	1.8	2.7	22.1
Moderate	1	6.3	12.5	86	3.0	6.8	19.5
Middle	2	12.5	23.4	233	8.2	16.6	21.9
Upper	11	68.8	47.7	2,317	82.0	62.7	36.5
Unknown	1	6.3	10.9	139	4.9	11.2	0.0
Total	16	100.0	100.0	2,827	100.0	100.0	100.0
Home Improvement Loans							
Low	0	0.0	23.8	0	0.0	17.4	22.1
Moderate	0	0.0	4.8	0	0.0	3.9	19.5
Middle	0	0.0	14.3	0	0.0	11.7	21.9
Upper	2	100.0	52.4	76	100.0	64.2	36.5
Unknown	0	0.0	4.8	0	0.0	2.7	0.0
Total	2	100.0	100.0	76	100.0	100.0	100.0
Total HMDA Reportable Loans							
Low	2	4.7	5.9	76	1.1	2.9	22.1
Moderate	2	4.7	14.0	193	2.9	9.8	19.5
Middle	7	16.3	21.6	669	9.9	18.4	21.9
Upper	27	62.8	44.4	5,064	75.1	54.3	36.5
Unknown	5	11.6	14.0	745	11.0	14.7	0.0
Total	43	100.0	100.0	6,747	100.0	100.0	100.0
<i>Source: 2019 FFIEC Census Data 2011-2015 U.S. Census Bureau: American Community Survey</i>							
<i>Note: Percentages may not total 100.0 percent due to rounding. Multifamily loans are not included in the borrower distribution analysis.</i>							

Distribution of 2019 HMDA Reportable Loans by Borrower Income Level							
Assessment Area: Nonmetropolitan West Virginia							
Borrower Income Level	Bank and Aggregate Loans						Families by Family Income %
	Bank		Agg	Bank		Agg	
	#	%	%	\$(000)	%	%	
Other Purpose LOC							
Low	0	0.0	0.0	0	0.0	0.0	22.1
Moderate	0	0.0	12.5	0	0.0	16.0	19.5
Middle	0	0.0	0.0	0	0.0	0.0	21.9
Upper	0	0.0	87.5	0	0.0	84.0	36.5
Unknown	0	0.0	0.0	0	0.0	0.0	0.0
Total	0	0.0	100.0	0	0.0	100.0	100.0
Other Purpose Closed/Exempt							
Low	0	0.0	9.1	0	0.0	4.6	22.1
Moderate	0	0.0	0.0	0	0.0	0.0	19.5
Middle	1	33.3	36.4	13	6.8	32.8	21.9
Upper	2	66.7	36.4	177	93.2	55.3	36.5
Unknown	0	0.0	18.2	0	0.0	7.3	0.0
Total	3	100.0	100.0	190	100.0	100.0	100.0
Purpose Not Applicable							
Low	0	0.0	0.0	0	0.0	0.0	22.1
Moderate	0	0.0	0.0	0	0.0	0.0	19.5
Middle	0	0.0	0.0	0	0.0	0.0	21.9
Upper	0	0.0	0.0	0	0.0	0.0	36.5
Unknown	0	0.0	100.0	0	0.0	100.0	0.0
Total	0	0.0	100.0	0	0.0	100.0	100.0
Source: 2019 FFIEC Census Data							
2011-2015 U.S. Census Bureau: American Community Survey							
Note: Percentages may not total 100.0 percent due to rounding.							

Distribution of 2019 HMDA Reportable Loans by Income Level of Geography							
Assessment Area: Nonmetropolitan West Virginia							
Geographic Income Level	Bank and Aggregate Loans						Owner Occupied Units %
	Bank		Agg	Bank		Agg	
	#	%	%	\$(000)	%	%	
Home Purchase Loans							
Low	0	0.0	0.0	0	0.0	0.0	0.0
Moderate	0	0.0	0.0	0	0.0	0.0	0.0
Middle	22	100.0	100.0	3,654	100.0	100.0	100.0
Upper	0	0.0	0.0	0	0.0	0.0	0.0
Total	22	100.0	100.0	3,654	100.0	100.0	100.0
Refinance Loans							
Low	0	0.0	0.0	0	0.0	0.0	0.0
Moderate	0	0.0	0.0	0	0.0	0.0	0.0
Middle	16	100.0	100.0	2,827	100.0	100.0	100.0
Upper	0	0.0	0.0	0	0.0	0.0	0.0
Total	16	100.0	100.0	2,827	100.0	100.0	100.0
Home Improvement Loans							
Low	0	0.0	0.0	0	0.0	0.0	0.0
Moderate	0	0.0	0.0	0	0.0	0.0	0.0
Middle	2	100.0	100.0	76	100.0	100.0	100.0
Upper	0	0.0	0.0	0	0.0	0.0	0.0
Total	2	100.0	100.0	76	100.0	100.0	100.0
Multifamily Loans							Multifamily Units %
Low	0	0.0	0.0	0	0.0	0.0	
Moderate	0	0.0	0.0	0	0.0	0.0	0.0
Middle	0	0.0	100.0	0	0.0	100.0	100.0
Upper	0	0.0	0.0	0	0.0	0.0	0.0
Total	0	0.0	100.0	0	0.0	100.0	100.0
Total HMDA Reportable Loans							Owner Occupied Units %
Low	0	0.0	0.0	0	0.0	0.0	
Moderate	0	0.0	0.0	0	0.0	0.0	0.0
Middle	43	100.0	100.0	6,747	100.0	100.0	100.0
Upper	0	0.0	0.0	0	0.0	0.0	0.0
Total	43	100.0	100.0	6,747	100.0	100.0	100.0
Source: 2019 FFIEC Census Data 2011-2015 U.S. Census Bureau: American Community Survey							
Note: Percentages may not total 100.0 percent due to rounding.							

Distribution of 2019 HMDA Reportable Loans by Income Level of Geography							
Assessment Area: Nonmetropolitan West Virginia							
Geographic Income Level	Bank and Aggregate Loans						Owner Occupied Units %
	Bank		Agg	Bank		Agg	
	#	#%	#%	\$(000)	\$%	\$%	
Other Purpose LOC							
Low	0	0.0	0.0	0	0.0	0.0	0.0
Moderate	0	0.0	0.0	0	0.0	0.0	0.0
Middle	0	0.0	100.0	0	0.0	100.0	100.0
Upper	0	0.0	0.0	0	0.0	0.0	0.0
Total	0	0.0	100.0	0	0.0	100.0	100.0
Other Purpose Closed/Exempt							
Low	0	0.0	0.0	0	0.0	0.0	0.0
Moderate	0	0.0	0.0	0	0.0	0.0	0.0
Middle	3	100.0	100.0	190	100.0	100.0	100.0
Upper	0	0.0	0.0	0	0.0	0.0	0.0
Total	3	100.0	100.0	190	100.0	100.0	100.0
Purpose Not Applicable							
Low	0	0.0	0.0	0	0.0	0.0	0.0
Moderate	0	0.0	0.0	0	0.0	0.0	0.0
Middle	0	0.0	100.0	0	0.0	100.0	100.0
Upper	0	0.0	0.0	0	0.0	0.0	0.0
Total	0	0.0	100.0	0	0.0	100.0	100.0
Source: 2019 FFIEC Census Data							
2011-2015 U.S. Census Bureau: American Community Survey							
Note: Percentages may not total 100.0 percent due to rounding.							

Distribution of 2018 HMDA Reportable Loans by Borrower Income Level							
Assessment Area: Nonmetropolitan West Virginia							
Borrower Income Level	Bank and Aggregate Loans						Families by Family Income %
	Bank		Agg	Bank		Agg	
	#	#%	#%	\$(000)	%	%	
Home Purchase Loans							
Low	0	0.0	6.9	0	0.0	3.6	22.3
Moderate	2	6.9	14.4	153	4.5	9.6	19.7
Middle	10	34.5	28.7	660	19.5	24.3	22.0
Upper	16	55.2	37.5	2,296	67.9	51.1	36.0
Unknown	1	3.4	12.5	271	8.0	11.4	0.0
Total	29	100.0	100.0	3,380	100.0	100.0	100.0
Refinance Loans							
Low	0	0.0	7.4	0	0.0	4.7	22.3
Moderate	1	10.0	13.2	55	7.0	10.2	19.7
Middle	4	40.0	23.1	379	48.0	16.9	22.0
Upper	5	50.0	47.9	356	45.1	59.3	36.0
Unknown	0	0.0	8.3	0	0.0	8.9	0.0
Total	10	100.0	100.0	790	100.0	100.0	100.0
Home Improvement Loans							
Low	0	0.0	8.7	0	0.0	7.9	22.3
Moderate	0	0.0	17.4	0	0.0	19.3	19.7
Middle	0	0.0	30.4	0	0.0	19.1	22.0
Upper	2	100.0	39.1	149	100.0	47.8	36.0
Unknown	0	0.0	4.3	0	0.0	5.9	0.0
Total	2	100.0	100.0	149	100.0	100.0	100.0
Total HMDA Reportable Loans							
Low	0	0.0	7.6	0	0.0	4.1	22.3
Moderate	3	7.3	13.6	208	4.8	9.8	19.7
Middle	14	34.1	25.8	1,039	24.1	21.2	22.0
Upper	23	56.1	41.8	2,801	64.9	53.5	36.0
Unknown	1	2.4	11.2	271	6.3	11.3	0.0
Total	41	100.0	100.0	4,319	100.0	100.0	100.0
Source: 2018 FFIEC Census Data 2011-2015 U.S. Census Bureau: American Community Survey							
Note: Percentages may not total 100.0 percent due to rounding. Multifamily loans are not included in the borrower distribution analysis.							

Distribution of 2018 HMDA Reportable Loans by Borrower Income Level Assessment Area: Nonmetropolitan West Virginia							
Borrower Income Level	Bank and Aggregate Loans						Families by Family Income %
	Bank		Agg	Bank		Agg	
	#	%	%	\$(000)	%	%	
Other Purpose LOC							
Low	0	0.0	27.3	0	0.0	19.9	22.3
Moderate	0	0.0	9.1	0	0.0	3.1	19.7
Middle	0	0.0	18.2	0	0.0	11.3	22.0
Upper	0	0.0	45.5	0	0.0	65.6	36.0
Unknown	0	0.0	0.0	0	0.0	0.0	0.0
Total	0	0.0	100.0	0	0.0	100.0	100.0
Other Purpose Closed/Exempt							
Low	0	0.0	0.0	0	0.0	0.0	22.3
Moderate	0	0.0	0.0	0	0.0	0.0	19.7
Middle	0	0.0	0.0	0	0.0	0.0	22.0
Upper	0	0.0	100.0	0	0.0	100.0	36.0
Unknown	0	0.0	0.0	0	0.0	0.0	0.0
Total	0	0.0	100.0	0	0.0	100.0	100.0
Purpose Not Applicable							
Low	0	0.0	0.0	0	0.0	0.0	22.3
Moderate	0	0.0	0.0	0	0.0	0.0	19.7
Middle	0	0.0	0.0	0	0.0	0.0	22.0
Upper	0	0.0	20.0	0	0.0	14.2	36.0
Unknown	0	0.0	80.0	0	0.0	85.8	0.0
Total	0	0.0	100.0	0	0.0	100.0	100.0
<i>Source: 2018 FFIEC Census Data 2011-2015 U.S. Census Bureau: American Community Survey</i>							
<i>Note: Percentages may not total 100.0 percent due to rounding.</i>							

Distribution of 2018 HMDA Reportable Loans by Income Level of Geography							
Assessment Area: Nonmetropolitan West Virginia							
Geographic Income Level	Bank and Aggregate Loans						Owner Occupied Units %
	Bank		Agg	Bank		Agg	
	#	%	%	\$(000)	%	\$%	
Home Purchase Loans							
Low	0	0.0	0.0	0	0.0	0.0	0.0
Moderate	0	0.0	0.0	0	0.0	0.0	0.0
Middle	29	100.0	99.5	3,380	100.0	99.8	100.0
Upper	0	0.0	0.0	0	0.0	0.0	0.0
Total	29	100.0	100.0	3,380	100.0	100.0	100.0
Refinance Loans							
Low	0	0.0	0.0	0	0.0	0.0	0.0
Moderate	0	0.0	0.0	0	0.0	0.0	0.0
Middle	10	100.0	100.0	790	100.0	100.0	100.0
Upper	0	0.0	0.0	0	0.0	0.0	0.0
Total	10	100.0	100.0	790	100.0	100.0	100.0
Home Improvement Loans							
Low	0	0.0	0.0	0	0.0	0.0	0.0
Moderate	0	0.0	0.0	0	0.0	0.0	0.0
Middle	2	100.0	100.0	149	100.0	100.0	100.0
Upper	0	0.0	0.0	0	0.0	0.0	0.0
Total	2	100.0	100.0	149	100.0	100.0	100.0
Multifamily Loans							Multifamily Units %
Low	0	0.0	0.0	0	0.0	0.0	
Moderate	0	0.0	0.0	0	0.0	0.0	0.0
Middle	0	0.0	100.0	0	0.0	100.0	100.0
Upper	0	0.0	0.0	0	0.0	0.0	0.0
Total	0	0.0	100.0	0	0.0	100.0	100.0
Total HMDA Reportable Loans							Owner Occupied Units %
Low	0	0.0	0.0	0	0.0	0.0	
Moderate	0	0.0	0.0	0	0.0	0.0	0.0
Middle	41	100.0	99.7	4,319	100.0	99.9	100.0
Upper	0	0.0	0.0	0	0.0	0.0	0.0
Total	41	100.0	100.0	4,319	100.0	100.0	100.0
Source: 2018 FFIEC Census Data							
2011-2015 U.S. Census Bureau: American Community Survey							
Note: Percentages may not total 100.0 percent due to rounding.							

Distribution of 2018 HMDA Reportable Loans by Income Level of Geography							
Assessment Area: Nonmetropolitan West Virginia							
Geographic Income Level	Bank and Aggregate Loans						Owner Occupied Units %
	Bank		Agg	Bank		Agg	
	#	%	%	\$(000)	\$%	\$%	
Other Purpose LOC							
Low	0	0.0	0.0	0	0.0	0.0	0.0
Moderate	0	0.0	0.0	0	0.0	0.0	0.0
Middle	0	0.0	100.0	0	0.0	100.0	100.0
Upper	0	0.0	0.0	0	0.0	0.0	0.0
Total	0	0.0	100.0	0	0.0	100.0	100.0
Other Purpose Closed/Exempt							
Low	0	0.0	0.0	0	0.0	0.0	0.0
Moderate	0	0.0	0.0	0	0.0	0.0	0.0
Middle	0	0.0	100.0	0	0.0	100.0	100.0
Upper	0	0.0	0.0	0	0.0	0.0	0.0
Total	0	0.0	100.0	0	0.0	100.0	100.0
Purpose Not Applicable							
Low	0	0.0	0.0	0	0.0	0.0	0.0
Moderate	0	0.0	0.0	0	0.0	0.0	0.0
Middle	0	0.0	100.0	0	0.0	100.0	100.0
Upper	0	0.0	0.0	0	0.0	0.0	0.0
Total	0	0.0	100.0	0	0.0	100.0	100.0
<i>Source: 2018 FFIEC Census Data 2011-2015 U.S. Census Bureau: American Community Survey</i>							
<i>Note: Percentages may not total 100.0 percent due to rounding.</i>							

Distribution of July 1, 2020-June 30, 2021 Consumer Loans by Borrower Income Level Assessment Area: Nonmetropolitan West Virginia					
Borrower Income Level	Bank Loans				Households by Household Income %
	#	#%	\$(000)	%	
Motor Vehicle Loans					
Low	19	13.0	314	9.5	25.2
Moderate	27	18.5	493	14.8	16.2
Middle	46	31.5	886	26.7	18.1
Upper	54	37.0	1,628	49.0	40.5
Unknown	0	0.0	0	0.0	0.0
Total	146	100.0	3,321	100.0	100.0
Other – Secured Loans					
Low	0	0.0	0	0.0	25.2
Moderate	11	22.0	135	12.7	16.2
Middle	16	32.0	287	27.0	18.1
Upper	22	44.0	610	57.3	40.5
Unknown	1	2.0	32	3.0	0.0
Total	50	100.0	1,064	100.0	100.0
Other – Unsecured Loans					
Low	5	5.3	43	3.7	25.2
Moderate	18	18.9	102	8.8	16.2
Middle	20	21.1	177	15.4	18.1
Upper	45	47.4	818	70.9	40.5
Unknown	7	7.4	14	1.2	0.0
Total	95	100.0	1,153	100.0	100.0
Total Consumer Loans					
Low	24	8.2	357	6.4	25.2
Moderate	56	19.2	730	13.2	16.2
Middle	82	28.2	1,350	24.4	18.1
Upper	121	41.6	3,056	55.2	40.5
Unknown	8	2.7	46	0.8	0.0
Total	291	100.0	5,538	100.0	100.0
Source: 2020 and 2021 FFIEC Census Data 2011-2015 U.S. Census Bureau: American Community Survey					
Note: Percentages may not total 100.0 percent due to rounding.					

Distribution of July 1, 2020-June 30, 2021 Consumer Loans by Income Level of Geography Assessment Area: Nonmetropolitan West Virginia					
Geographic Income Level	Bank Loans				Households %
	#	#%	\$(000)	\$%	
Motor Vehicle Loans					
Low	0	0.0	0	0.0	0.0
Moderate	0	0.0	0	0.0	0.0
Middle	146	100.0	3,321	100.0	100.0
Upper	0	0.0	0	0.0	0.0
Total	146	100.0	3,321	100.0	100.0
Other – Secured Loans					
Low	0	0.0	0	0.0	0.0
Moderate	0	0.0	0	0.0	0.0
Middle	50	100.0	1,064	100.0	100.0
Upper	0	0.0	0	0.0	0.0
Total	50	100.0	1,065	100.0	100.0
Other – Unsecured Loans					
Low	0	0.0	0	0.0	0.0
Moderate	0	0.0	0	0.0	0.0
Middle	95	100.0	1,153	100.0	100.0
Upper	0	0.0	0	0.0	0.0
Total	95	100.0	1,153	100.0	100.0
Total Consumer Loans					
Low	0	0.0	0	0.0	0.0
Moderate	0	0.0	0	0.0	0.0
Middle	291	100.0	5,538	100.0	100.0
Upper	0	0.0	0	0.0	0.0
Total	291	100.0	5,538	100.0	100.0
Source: 2020 and 2021 FFIEC Census Data 2011-2015 U.S. Census Bureau: American Community Survey					
Note: Percentages may not total 100.0 percent due to rounding.					

Distribution of January 1, 2020-June 30, 2021 Small Business Lending by Revenue Size of Businesses Assessment Area: Nonmetropolitan West Virginia					
	Bank Loans				Total Businesses %
	#	%	\$(000)	%	
By Revenue					
\$1 Million or Less	3	4.5	126	0.5	90.8
Over \$1 Million	5	7.5	2,405	8.9	6.4
Revenue Unknown	59	88.1	24,354	90.6	2.8
Total	67	100.0	26,885	100.0	100.0
By Loan Size					
\$100,000 or Less	50	74.6	1,438	5.3	
\$100,001 - \$250,000	7	10.4	1,187	4.4	
\$250,001 - \$1 Million	6	9.0	2,024	7.5	
Total	67	100.0	26,885	100.0	
By Loan Size and Revenue \$1 Million or Less					
\$100,000 or Less	3	100.0	126	100.0	
\$100,001 - \$250,000	0	0.0	0	0.0	
\$250,001 - \$1 Million	0	0.0	0	0.0	
Total	3	100.0	126	100.0	
<i>Source: 2020 and 2021 FFIEC Census Data 2020 Dun & Bradstreet Data 2011-2015 U.S. Census Bureau: American Community Survey</i>					
<i>Note: Percentages may not total 100.0 percent due to rounding.</i>					

Distribution of January 1, 2020-June 30, 2021 Small Business Lending by Income Level of Geography Assessment Area: Nonmetropolitan West Virginia					
Geographic Income Level	Bank Loans				Total Businesses %
	#	%	\$(000)	%	
Low	0	0.0	0	0.0	0.0
Moderate	0	0.0	0	0.0	0.0
Middle	67	100.0	26,885	100.0	100.0
Upper	0	0.0	0	0.0	0.0
Total	67	100.0	26,885	100.0	100.0
<i>Source: 2020 and 2021 FFIEC Census Data 2020 Dun & Bradstreet Data 2011-2015 U.S. Census Bureau: American Community Survey</i>					
<i>Note: Percentages may not total 100.0 percent due to rounding.</i>					

Appendix E – Glossary of Terms

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 metropolitan area/assessment area.

Census tract: 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 statistical 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, designated disaster areas; or designated distressed or underserved nonmetropolitan middle-income geographies.

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 lines of credit, 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 nonrelatives 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-scope review: Performance is analyzed considering performance context, quantitative factors (for example, geographic distribution, borrower distribution, and total number and dollar amount of investments), and qualitative factors (for example, 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 (for example, approved, denied, and withdrawn).

Home mortgage loans: Includes home purchase and home improvement loans as defined in the HMDA regulation. This definition also includes multifamily (five or more families) dwelling loans, loans for the purchase of manufactured homes and refinancings of home improvement and home purchase loans.

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

Limited-scope review: Performance is analyzed using only quantitative factors (for example, 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 metropolitan area/assessment area.

Metropolitan area (MA): A metropolitan statistical area (MSA) or a metropolitan division (MD) as defined by the Office of Management and Budget. A MSA is a core area containing at least one urbanized area of 50,000 or more inhabitants, together with adjacent communities having a high degree of economic and social integration with that core. A MD is a division of a MSA based on specific criteria including commuting patterns. Only a MSA that has a population of at least 2.5 million may be divided into MDs.

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 multistate 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 multistate metropolitan area, the institution will receive a rating for the multistate 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) instructions. These loans have original amounts of \$1 million or less and typically are either secured by nonfarm or nonresidential real estate or are classified as commercial and industrial loans. However, thrift institutions may also exercise the option to report loans secured by nonfarm residential real estate as "small business loans" if the loans are reported on the TFR as nonmortgage, commercial loans.

Small loan(s) to farm(s): A loan included in 'loans to small farms' as defined in the instructions for preparation of the Consolidated Reports 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.

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