

PUBLIC DISCLOSURE

October 19, 2015

**COMMUNITY REINVESTMENT ACT
PERFORMANCE EVALUATION**

United Bank, Inc.

1010930

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Parkersburg, West Virginia 26101

**Federal Reserve Bank of Richmond
P. O. Box 27622
Richmond, Virginia 23261**

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 RATING

INSTITUTION'S CRA RATING: United Bank, Inc. is rated "SATISFACTORY."

The following table indicates the performance level of United Bank, Inc. with respect to the lending, investment, and service tests.

PERFORMANCE LEVELS	<u>United Bank, Inc.</u>		
	PERFORMANCE TESTS		
	Lending Test*	Investment Test	Service Test
Outstanding			X
High Satisfactory	X		
Low Satisfactory		X	
Needs to Improve			
Substantial Noncompliance			

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

Major factors supporting the institution's rating include:

- Lending activity overall is consistent with the bank's capacity and market presence.
- A high percentage of the institution's reported Home Mortgage Disclosure Act (HMDA) and small business loans were originated within the bank's assessment areas.
- The bank's geographic distribution performance (lending in low- and moderate-income census tracts) varies from adequate to excellent by product and year across all of its assessment areas. Despite this variation, geographic distribution performance is most often excellent and is considered excellent overall.
- The bank's borrower distribution performance (lending to low- and moderate-income borrowers and small businesses having annual revenues of \$1 million or less) varies from poor to excellent by product and year across all of its assessment areas. The performance is most often considered good and is considered good overall.
- During the evaluation period, the bank extended a relatively high level of qualified community development loans within its assessment areas.
- The bank maintains an adequate level of qualified community development investments when considering available opportunities.
- Delivery systems and branch locations are readily accessible to all segments of the bank's assessment areas and within most of those areas, bank employees support a relatively large number of organizations that provide community development services.

INSTITUTION

SCOPE OF EXAMINATION

United Bank, Inc. (UBI) was evaluated using the interagency examination procedures for large institutions developed by the Federal Financial Institutions Examination Council (FFIEC). Consistent with these procedures, HMDA, small business, and small farm lending activity reported by the institution from January 1, 2013, through December 31, 2014, was reviewed. This includes all such loans originated and purchased by UBI during the two-year time period. Loans extended or purchased by other affiliates or subsidiaries are not included or considered in the evaluation. Since UBI reported only 36 small farm loans totaling \$3.7 million in two calendar years, further analysis of these loans was not warranted, as doing so would not yield meaningful conclusions relative to rating the bank's performance.

Throughout the analysis of lending, loans without a reported income (in the case of borrower distribution) and loans where the reported geographic information is incomplete (in the case of geographic distribution) are excluded from both bank loan totals and comparative aggregate lending totals.

Qualified community development loans that were originated or renewed from June 3, 2013, the date of the most recent CRA evaluation, through the evaluation date are considered for this evaluation. All qualified community development services provided since the previous evaluation, and all qualified investments made during this same period, and those outstanding as of the evaluation regardless of when made, were also considered.

To help determine the availability of community development opportunities in specific assessment areas, the CRA public evaluations of other financial institutions operating in these areas were reviewed. Also, in some markets contact with members of the community were made to discern information about local economic conditions, local credit needs, performance of banks in the assessment area, as well as potential community development opportunities.

Because of its branch locations, an overall rating and ratings for the lending, investment, and service tests are assigned to the institution, the Wheeling, WV-OH multistate MSA, the Washington-Baltimore-Northern Virginia, DC-MD-VA-WV multistate CSA, the State of West Virginia and the Commonwealth of Pennsylvania. The West Virginia state rating is based only on the performance in the assessment areas subject to the full-scope review and excludes the Wheeling, WV-OH multistate MSA and Washington-Baltimore-Northern Virginia, DC-MD-VA-WV multistate CSA assessment areas, as these are rated separately. For assessment areas that are reviewed utilizing the limited scope evaluation procedures, a determination was made as to whether performance was consistent with the assigned overall state rating. Because of requirement to assign ratings in some instances and the relative size as determined by loan activity, proportion of bank deposits, and market population in other instances, full-scope evaluation procedures were applied to the Wheeling, WV-OH multistate MSA; Washington-Baltimore-Northern Virginia, DC-MD-VA-WV multistate CSA; Charleston-Huntington-Ashland, WV-OH-KY CSA; Morgantown, WV MSA; the Braxton, WV nonmetropolitan statistical area (NonMSA); and the Pittsburgh, PA MSA assessment areas. The remaining four assessment areas were subject to the limited review process also provided for by the FFIEC.

The institution's overall rating for each test is based on the ratings assigned to the Wheeling, WV-OH MSA and Washington-Baltimore-Northern Virginia, DC-MD-VA-WV multistate CSA, West Virginia, and Pennsylvania. Performance within each multistate MSA or state is weighted primarily according to the level of associated bank activity as measured by relative lending volume, amount of deposits, and the number of branches.

According to evaluation procedures, the lending test performance accounts for half of the overall rating, while the investment and service tests are equally weighted and combined account for the remaining half of the overall rating.

DESCRIPTION OF INSTITUTION

UBI operates 63 full-service branch offices throughout West Virginia, western Maryland, southeastern Ohio, and southwestern Pennsylvania. Headquartered in Parkersburg, West Virginia, UBI is a subsidiary of United Bankshares, Inc., a multi-bank holding company headquartered in Charleston, West Virginia. UBI is the largest commercial bank headquartered in West Virginia. The bank and its holding company have a number of other affiliates and subsidiaries including one other bank subsidiary, United Bank, headquartered in Fairfax, Virginia. Notable for assisting the bank in meeting its CRA obligations is another affiliate, United Venture Fund, a licensed community development organization.

As of June 30, 2015, UBI had assets of \$5.3 billion, of which 80.7% were net loans and 6.7% were securities. Deposits totaled \$4.3 billion as of the same time period. Various deposit and loan products are available through the institution including loans for residential mortgage, consumer, and business purposes. The composition of the loan portfolio (using gross loans) as of June 30, 2015, is represented in the following table:

Composition of Loan Portfolio

Loan Type	6/30/2015	
	\$(000s)	%
Secured by 1-4 Family dwellings	1,258,546	28.9
Multifamily	271,015	6.2
Construction and Development	317,250	7.3
Commercial & Industrial/ NonFarm NonResidential	1,915,419	44.0
Consumer Loans and Credit Cards	380,419	8.7
Agricultural Loans/ Farmland	19,174	0.4
All Other	192,400	4.4
Total	4,354,223	100.0

As indicated in the preceding table, UBI is an active residential mortgage and commercial lender. The bank offers other loans, such as consumer and farm loans; however, the dollar volume of such lending is relatively small in comparison to its residential mortgage and commercial lending. Based on its financial capacity, there are no significant limitations on the bank's ability to meet credit needs within the communities it serves.

The bank serves ten assessment areas throughout West Virginia, southeastern Ohio, western Maryland, and southwestern Pennsylvania. Appendix E describes the composition of each assessment area, and Appendix D provides a table reflecting the number and percentage of branches, volume of lending, and volume of deposits by assessment area and includes subtotals for the State of West Virginia and the Commonwealth of Pennsylvania, including the Wheeling, WV-OH multistate MSA and the Charleston-Huntington-Ashland, WV-OH-KY multistate CSA.

UBI received a satisfactory rating at its prior CRA evaluation conducted June 3, 2013. UBI has not opened or closed any offices since the previous evaluation.

CONCLUSIONS WITH RESPECT TO PERFORMANCE TESTS

LENDING TEST

An analysis of lending for the review period is discussed in greater detail later in this evaluation for assessment areas receiving a full scope review. In the analysis of each assessment area, tables regarding the bank's performance for loans reported in 2014 are utilized. Though tables are not presented for 2013 performance, the data was analyzed and a statement as to whether that performance is consistent with 2014 is included. Within the relevant markets, pertinent details about lending performance are provided when there is a meaningful difference in performance between the years included in the analysis.

In assessing the bank's HMDA lending performance, consideration was given to all HMDA loan categories and the associated performance for each and the proportion of each category relative to the bank's total reported HMDA activity. Each category has been analyzed independently, and overall conclusions consider the performance of all the HMDA loan categories. In general, greater weight was given to loan categories and years with higher associated dollar volume.

It is also noted that throughout the majority of the bank's assessment areas, a high level of small business lending activity is noted for specialized lenders, who tend to originate small business loans in the form of credit cards. These loans, however, tend to be much smaller in size than traditional small business bank loans. The presence of these lenders is reflected in a smaller market share for traditional lenders, such as UBI. Not only do such loans tend to be smaller, but when included in the aggregate, these reporters tend to depress the proportion of reported loans to businesses with revenues of \$1 million or less because a large proportion of such loans reported do not include revenue information. These factors were considered as an aspect of performance context when evaluating the level and distribution of bank lending.

The lending test is rated high satisfactory overall, considering lending activity, the distribution of lending among borrowers and geographies of different income levels, as well as the amount and responsiveness of community development lending in the bank's assessment areas. Area demographic data, Dun & Bradstreet business data (D&B), and market aggregate information are used as proxies for demand when evaluating the bank's performance. Aggregated data include lending by UBI and all other reporting institutions that originated and/or purchased loans of the type considered within the bank's assessment areas. Demographic data are from the 2010 census, D&B business data are from 2013 and 2014, and the small business and HMDA aggregate data are from calendar years 2013 and 2014. In analyzing the bank's community development lending performance, contextual information was obtained through the review of other bank's CRA performance evaluations within the respective assessment areas and in some cases community contacts.

Lending Activity:

A bank's loan-to-deposit ratio is one measure of its lending relative to its capacity. The bank's quarterly loan-to-deposit ratio for the nine-quarter period ending June 30, 2015, averaged 100.1% and ranged from 96.9% to 106.3%. During the nine quarters ending June 30, 2015, the average of quarterly loan-to-deposit ratios of the national peer group ranged from 79.5% to 83.7%. The national peer group is defined as all insured commercial banks having assets over \$3 billion. UBI's loan-to-deposit ratio, as of June 30, 2015, equaled 99.9%. Considering only the loan-to-deposit ratio, the bank demonstrates excellent responsiveness to assessment area credit needs. No barriers to the bank's ability to lend were noted. Since March 31, 2013, bank assets, loans, and deposits increased by 8.9%, 9.8%, and 6.1%, respectively.

UBI's Affordable Housing Option (AHO) loan program is available for borrowers who do not meet the underwriting criteria necessary for the secondary market. This program offers home purchase, refinance, and rehabilitation loans with up to 97% financing and flexible underwriting criteria. The program is limited to families whose incomes generally do not exceed 80% of the HUD median family income for their county of residence. During the evaluation period, the bank originated 90 such loans totaling approximately \$6.8 million. Additionally, UBI offers the FHA Title 1 Home Improvement Program for qualified home improvement loans. These loans carry a 90% guarantee against loss from the FHA and offer flexible nontraditional underwriting criteria. Since the prior evaluation, this program has resulted in 240 new Title 1 loans totaling \$2.8 million.

Lending activity is discussed in more detail in the multistate MSA and CSA, state, and full scope assessment area sections later in this report. When considering performance at the assessment area level along with the bank's loan-to-deposit ratio and special loan programs, overall lending activity is good relative to the bank's capacity to lend and the economic conditions within the bank's market areas.

Assessment Area Concentration:

Loan data included in the following table reflects all originations and purchases for specific loan types from January 1, 2013, through December 31, 2014.

Comparison of Credit Extended Inside and Outside of Assessment Area(s)

Loan Type	Inside				Outside			
	#	%	\$(000)	%	#	%	\$(000)	%
Home Purchase	1,436	86.8	246,455	77.2	219	13.2	72,985	22.8
Home Improvement	750	74.0	28,342	79.4	263	26.0	7,373	20.6
Refinancing	797	87.7	137,653	79.3	112	12.3	35,909	20.7
Multi-Family Housing	78	88.6	135,088	67.5	10	11.4	65,099	32.5
Total HMDA related	3,061	83.5	547,538	75.1	604	16.5	181,366	24.9
Small Business	2,704	81.9	403,528	78.4	597	18.1	111,250	21.6
Small Farm	22	61.1	968	26.4	14	38.9	2,695	73.6
TOTAL LOANS	5,787	82.6	952,034	76.3	1,215	17.4	295,311	23.7

As indicated above, a high percentage of the number (82.6%) and dollar amounts (76.3%) of loans have been provided to residents and businesses of the bank's assessment areas. Overall, the percentage of loans made in the bank's assessment areas is considered responsive to community credit needs.

Geographic and Borrower Distribution:

When evaluating the geographic and borrower distribution for a specific loan category (HMDA and small business) within an assessment area, primary emphasis is placed on the number (and corresponding percentage) of loans originated or purchased. When considering all loan products to arrive at an overall conclusion, the level of performance of each category is typically weighted by the dollar volume of each category. Similarly, when the performance of multiple assessment areas is considered to reach a state and/or institutional rating, the levels of performance of the assessment areas subject to full scope reviews are weighted primarily according to their dollar volume during the review period. In all cases, conclusions additionally take into consideration relevant performance context factors, such as the previously noted lending activity of specialized credit card lenders, which is relevant when evaluating the bank's small business lending distribution by revenue of business using aggregate data as a proxy for demand. While the geographic and borrower distribution of loans in the markets reviewed using the full scope review examination procedures is varied, overall geographic distribution is considered excellent while borrower distribution is considered good.

Community Development Lending:

The bank has made a relatively high level of loans for a variety of community development purposes, originating or renewing 135 such loans totaling approximately \$56.8 million. These loans were made to borrowers that develop affordable housing, offer community services to low- and moderate-income borrowers, or promote economic development within the bank's markets. Later in this evaluation, specific community development loans are discussed in the particular assessment area that benefited from the lending.

INVESTMENT TEST

The institution's level of responding to community development needs through its investment activities is rated low satisfactory. Investments in equity housing funds, low-income mortgage loan pools, venture capital companies, and qualified community development bonds have been made. These investments are considered responsive to community credit needs. As of August 31, 2015, UBI held \$8.4 million in qualified investments.

The bank's qualified investments include the following:

- An investment totaling \$2.5 million in the CRA Fund. The Fund invests in community development projects that typically provide for affordable housing, the revitalization of low- and moderate-income areas, microenterprise development, and otherwise improve the quality of life for low- and moderate-income people. While the Fund's individual investments are throughout the country, quarterly the bank's investment is allocated by the Fund for affordable housing projects throughout all the bank's assessment areas.
- UBI maintains a \$904,000 equity investment in the United Venture Fund, a new markets venture capital company. The company provides venture capital to small independent businesses in the form of equity investments and subordinate debt. United Venture Fund's operations focus on businesses located throughout the State of West Virginia.
- A \$1,000 investment in Community Affordable Housing Equity Corporation (CAHEC). CAHEC invests in Low-Income Housing Tax Credit (LIHTC) projects located in the southeast and mid-Atlantic regions of the United States. UBI's investment is used to fund projects throughout the State of West Virginia. Of the bank's investment, \$790 has provided funding for projects in Kanawha County and approximately \$210 has funded projects in Harrison County.
- The bank maintains a \$2 million investment in Qualified Zone Academy Bonds (QZAB). For schools serving low-income students, QZABs reduce the burden of interest payments by giving financial institutions holding the bonds a tax credit in lieu of interest. A qualified school is one that is located in an Empowerment Zone or Enterprise Community or has at least 35% of its students eligible for free or reduced price school lunch. The bank has two bonds of \$1 million each; one of the bonds serves Logan County and the other serves Harrison County.
- A \$20,000 equity investment in the Ohio Valley Community Development Corporation (CDC). The CDC's primary focus is to facilitate small business development and increase employment opportunities in the Wheeling multistate MSA.
- Two mortgage backed securities totaling \$2.2 million dollars; a Fannie Mae (FM) security of \$1.2 million and a Ginnie Mae (GM) investment of \$1 million. These investments contain a high concentration of loans with household income levels that meet the low- and moderate-income definitions of the CRA, and, promote affordable housing.

- UBI holds a \$715,000 investment in the Pennsylvania Housing Finance Agency Single Family Mortgage Revenue Bond. This investment provides affordable housing throughout the Commonwealth, including Fayette County, which is served by the bank.

The institution also actively supports numerous community development organizations through grants and/or donations. Since the previous evaluation, donations totaling \$584,563 were made to community development organizations whose operations assist low- and moderate-income people and/or areas or support microenterprise development, as well as, distressed and/or underserved areas.

SERVICE TEST

The bank's overall performance under the service test is rated outstanding. Delivery systems, branch locations, and hours of operation are considered readily accessible and convenient to all portions of the assessment areas. Of the 63 full service branch offices, four (6.3%) are located within low-income areas and 16 (25.4%) are located in moderate-income areas.

UBI also is a leader in supporting community development organizations that provide community development services throughout its various assessment areas. Discussion of specific activities is included for each assessment area, as applicable.

Of note, the bank has partnered with the Federal Home Loan Bank-Pittsburgh (FHLBP) and participates in many of its affordable housing programs, as well as its small business assistance program, by assisting residents and businesses in the bank's assessment areas with obtaining grants from the FHLBP. The bank participates in the FHLBP's Affordable Housing Program (AHP), First Front Door (FFD), and Banking on Business (BOB). The AHP program provides grants and loans for affordable housing projects including new and rehabilitated single- and multi-family housing projects. Since the previous evaluation, the bank, has participated in 20 projects under the AHP program that have received grants totaling \$5.6 million; the FFD has provided two eligible first time homebuyers with down payment and closing cost assistance totaling \$10,000; the BOB program has provided two eligible small businesses with start-up and expansion funding totaling \$387,000. Additionally, UBI partners with the Federal Home Loan Bank-Atlanta (FHLBA). The FHLBA program offers grants for eligible home improvement projects for low- or moderate-income veterans. Since the previous evaluation, nine applications were submitted and six veterans received in excess of \$70,000 in home improvement assistance. Participation in such loan programs and partnerships demonstrates UBI's commitment to its local market areas and a willingness to participate in flexible and sometimes complex credit transactions that benefit low- and moderate-income borrowers and/or areas.

FAIR LENDING OR OTHER ILLEGAL CREDIT PRACTICES REVIEW

No evidence of discriminatory or other illegal credit practices inconsistent with helping to meet community credit needs was identified. Adequate policies, procedures, and training programs have been developed to support nondiscrimination in lending activities.

MULTISTATE METROPOLITAN AREA

CRA RATING FOR WHEELING, WEST VIRGINIA-OHIO ¹ ASSESSMENT AREA: Satisfactory

The lending test is rated: High Satisfactory

The investment test is rated: Low Satisfactory

The service test is rated: High Satisfactory

Major factors supporting the rating include:

- Lending activity is good and consistent with the bank's capacity and helps to meet identified credit needs.
- Overall, and for each product reviewed, the geographic and the borrower lending distribution are each considered good.
- An adequate level of community development loans were originated within the assessment area.
- The bank maintains an adequate level of qualified investments.
- Delivery systems and branch locations are readily accessible to all segments of the assessment area.
- An adequate level of participation in qualified community development services was noted.

SCOPE OF EXAMINATION

The institution's lending test evaluation includes analysis of all reported HMDA and small business loan data for loans either originated or purchased during calendar years 2013 and 2014. Community development loans made and qualified community development services provided from the date of the previous evaluation through the evaluation date were also considered. All qualified investments made during this same period or outstanding as of the examination date, regardless of when made, were considered.

DESCRIPTION OF INSTITUTION'S OPERATIONS IN THE WHEELING, WV-OH MSA ASSESSMENT AREA

The Wheeling, WV-OH multistate MSA assessment area includes the counties of Marshall and Ohio, WV, and Belmont County, Ohio. This market area constitutes the entire MSA, and the bank operates eight full-service branches within this market area. According to 2010 census data, the assessment area has a population of 147,950 and a median housing value of \$85,570. The owner-occupancy rate of the assessment area equals 65.6%, which slightly exceeds the rates for both Ohio (61.7%) and West Virginia (62.9%). In the assessment area, 12.5% of families are considered below the poverty level, while 10.3% of families in Ohio and 12.8% of families in West Virginia are impoverished. The 2013 and 2014 median family income for the MSA equaled \$51,700 and \$56,200, respectively. The following table includes pertinent demographic data regarding the bank's assessment area.

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

Assessment Area Demographics

Wheeling, WV-OHMSA <i>(2014 FFIEC Census Data and 2014 D&B Information)</i>								
Income Categories*	Tract Distribution		Families by Tract		Families < Poverty as a % of Families by Tract		Families by Family Income	
	#	%	#	%	#	%	#	%
Low	4	8.5	1,258	3.1	556	44.2	7,930	19.6
Moderate	10	21.3	7,063	17.4	1,340	19.0	8,055	19.9
Middle	22	46.8	22,159	54.6	2,532	11.4	8,209	20.2
Upper	11	23.4	10,076	24.9	629	6.2	16,362	40.3
NA	0	0.0	0	0.0	0	0.0		
Total	47	100.0	40,556	100.0	5,057	12.5	40,556	100.0
	Owner Occupied Units by Tract		Households					
	#	%	HHs by Tract		HHs < Poverty by Tract		HHs by HH Income	
	#	%	#	%	#	%	#	%
Low	980	2.1	2,567	4.2	1,129	44.0	14,734	23.8
Moderate	7,749	17.0	11,356	18.4	2,515	22.1	10,172	16.4
Middle	25,052	54.8	32,607	52.7	4,569	14.0	11,031	17.8
Upper	11,926	26.1	15,321	24.7	1,509	9.8	25,914	42.0
NA	0	0.0	0	0.0	0	0.0		
Total	45,707	100.0	61,851	100.0	9,722	15.7	61,851	100.0
	Total Businesses by Tract		Businesses by Tract and Revenue Size					
	#	%	Less than or = \$1 Million		Over \$1 Million		Revenue not Reported	
	#	%	#	%	#	%	#	%
Low	627	10.6	508	9.8	83	18.5	36	12.6
Moderate	968	16.3	832	16.0	91	20.3	45	15.7
Middle	2,604	43.8	2,300	44.2	159	35.5	145	50.7
Upper	1,740	29.3	1,565	30.0	115	25.7	60	21.0
NA	0	0.0	0	0.0	0	0.0	0	0.0
Total	5,939	100.0	5,205	100.0	448	100.0	286	100.0
Percentage of Total Businesses:				87.6		7.5		4.9

*NA-Tracts without household or family income as applicable

The assessment area's economy is dependent upon health care, coal mining, natural gas, construction, tourism, and manufacturing for jobs. Major employers include: Wheeling Hospital, Inc., Ohio County Board of Education, Marshall County Coal Company, Rob-Tom Inc., Ohio Valley Medical Center, Inc., Cabela's Warehouse, Inc., Wheeling Park Commission, and Wesbanco Bank, Inc. The table below provides September unemployment rates for each year since the previous evaluation.

Geographic Area	Sept-13	Sept-14	Sept-15
Marshall County, WV	6.5%	6.6%	8%
Ohio County, WV	5.1%	5%	5.4%
Belmont County, OH	7.4%	5.5%	5.6%
Wheeling, WV-OH MSA	6.5%	5.5%	6.1%
State of Ohio	7.2%	5.1%	4.3%
State of West Virginia	6.1%	5.8%	6.3%

As reflected in the preceding table, unemployment rates in Ohio have trended downward since the previous evaluation, while West Virginia unemployment rates have fluctuated during the same time period. Two local officials were contacted during the evaluation to better understand current economic conditions. An economic development official indicated that while local unemployment rates remain high compared to national figures, economic conditions are improving and vibrant and that business conditions are favorable with respect to the coal industry and industrial chemical companies within the assessment area. The contact indicated that the two industries will bring much needed jobs to the local area. The official mentioned that within the market, financing programs are offered to small businesses in which local financial institutions frequently participate, and that local banks are adequately serving the community. Additionally, a local housing official indicated that while local economic conditions have been poor for quite some time, conditions have improved since the previous evaluation. However, the need for affordable housing, especially in the communities located near the Ohio River, remains a high priority for their office. The contact indicated that local financial institutions are adequately serving the needs of the local market.

Overall, discussions with the individuals knowledgeable of the local market area and reviews of the performance evaluations of other financial institutions having a local presence indicate that community development opportunities are reasonably available within the bank's assessment area when considering the bank's strategy, size, competition, and other area relevant factors. Additionally, the institution faces no significant constraints relative to its size and business strategy in making community development loans or investments.

CONCLUSIONS WITH RESPECT TO PERFORMANCE TESTS IN THE WHEELING, WV-OH MSA ASSESSMENT AREA

LENDING TEST

The institution's overall lending performance within this assessment area is considered high satisfactory. This conclusion is based on an evaluation of UBI's lending activity, its geographic and its borrower distribution of lending, and its level of community development lending, while taking into account the bank's market strategy, area demographic data, and aggregate CRA small business and HMDA loan data. Good geographic and borrower distribution performance is the primary driver for the overall lending test rating in this market.

Lending Activity:

Bank lending activity within the market, as measured by both number (6.2%) and dollar volume (4.1%), is less than the percentage of branches in the area (12.7%) and the percentage of the bank's deposits within the area (9.6%). As of June 2014, UBI ranked second of 15 institutions in deposit market share having 10.5% of the assessment area's available Federal Deposit Insurance Corporation (FDIC) insured deposits (credit union deposits are not included). According to 2014 aggregate data, the institution ranked 12th out of 137 reporters in reported mortgage lending with a 2.7% market share and ranked sixth in out of 38 reporters in small business loans with a 6.2% market share. Additionally, according to 2013 aggregate data, the institution ranked 12th out of 155 reporters in mortgage lending with a 2.8% market share and ranked sixth out of 37 reporters in small business loans with a 6% market share. Both market share rankings consider originated and purchased loans. Given its deposit share and its market presence as evidenced by these market share percentages, the bank's lending activity is considered good.

Geographic Distribution:

Overall, the geographic loan distribution within this assessment area is considered good. While overall distribution for HMDA lending is considered adequate, small business lending is considered excellent, and more weight was given to the bank's small business lending as it had the greatest dollar volume during the evaluation period.

Distribution of HMDA Loans by Income Level of Census Tract

Wheeling, WV-OHMSA (2014)								
Income Categories	Bank				Aggregate			
	#	%	\$(000s)	%\$	#	%	\$(000s)	%\$
	(32) Home Purchase				(1,346)			
Low	0	0.0	0	0.0	23	1.7	1,145	0.7
Moderate	2	6.3	132	4.5	168	12.5	14,117	8.7
Middle	12	37.5	710	24.4	707	52.5	76,838	47.2
Upper	18	56.2	2,062	71.1	448	33.3	70,539	43.4
	(11) Refinance				(825)			
Low	0	0.0	0	0.0	12	1.5	518	0.6
Moderate	0	0.0	0	0.0	122	14.8	9,622	11.3
Middle	7	63.6	345	43.1	445	53.9	41,618	49.0
Upper	4	36.4	456	56.9	246	29.8	33,121	39.1
	(24) Home Improvement				(327)			
Low	0	0.0	0	0.0	8	2.4	184	1.1
Moderate	3	12.5	121	20.3	56	17.1	1,940	11.5
Middle	13	54.2	239	40.0	177	54.1	8,314	49.3
Upper	8	33.3	237	39.7	86	26.4	6,429	38.1
	(0) Multi-Family				(16)			
Low	0	0.0	0	0.0	5	31.3	5,733	38.1
Moderate	0	0.0	0	0.0	4	25.0	610	4.1
Middle	0	0.0	0	0.0	3	18.8	3,918	26.1
Upper	0	0.0	0	0.0	4	24.9	4,770	31.7
	HMDA Totals							
Low	0	0.0	0	0.0	48	1.9	7,580	2.7
Moderate	5	7.5	253	5.9	350	13.9	26,289	9.4
Middle	32	47.8	1,294	30.1	1,332	53.0	130,688	46.8
Upper	30	44.7	2,755	64.0	784	31.2	114,859	41.1
NA*	NA	NA	NA	NA	NA	NA	NA	NA
Total	67	100.0	4,302	100.0	2,514	100.0	279,416	100.0

NA*-Tracts without household or family income as applicable

During 2014, home purchase lending was the bank's leading HMDA product by number of loans, followed by home improvement and refinance lending, respectively. As such, when determining an overall performance level, more weight is given to the bank's home purchase lending followed by its home improvement lending and refinance lending. Within this assessment area, there are four low-income census tracts containing just 2.1% of the market area's owner-occupied housing units, and UBI's lack of lending in such tracts reflects the very limited effective demand for credit. Potential demand, however, is greater within the ten moderate-income tracts containing 17% of the owner-occupied housing units. Considering both demographic and aggregate proxies for demand, the bank's performance in moderate-income tracts for home purchase and refinance loans is poor. The distribution of home improvement loans is adequate in such tracts.

On a combined basis, the bank's lending in moderate-income census tracts (7.5%) is below reported aggregate lending (13.9%) and the proportion of owner-occupied units within such tracts (17%) and is considered poor. Given the limited loan demand in the four area low-income tracts, more weight is assigned to the distribution of lending within moderate-income census tracts, and, overall, UBI's performance is considered poor.

During 2013, the bank originated 96 HMDA loans in the assessment area totaling \$11.3 million. Within low-income areas, the percentage of owner-occupied housing (2.1%) and the aggregate level of lending (1.3%) were both higher than the bank’s level of low-income census tract lending (1%) and the bank’s lending performance in such tracts is considered adequate. Within moderate-income areas, the bank’s lending was 12.5%, lower than the 17% of owner-occupied housing, but equal to that of aggregate lenders, representing a good distribution of lending. Overall, the bank’s 2013 performance level is considered good.

On a combined basis, the bank’s HMDA geographic distribution is considered adequate. In reaching that conclusion, greater weight is given to the bank’s 2013 performance, as UBI originated a larger dollar volume of lending during that year.

Distribution of Small Business Loans by Income Level of Census Tract

Wheeling, WV-OHMSA (2014)								
Income Categories	Bank				Aggregate			
	#	%	\$(000s)	%\$	#	%	\$(000s)	%\$
Low	14	13.7	2,216	16.4	160	10.1	7,548	10.9
Moderate	28	27.5	2,058	15.2	270	17.0	12,453	18.0
Middle	27	26.5	5,824	43.0	640	40.2	31,027	44.9
Upper	33	32.3	3,436	25.4	522	32.7	18,062	26.2
NA*	NA	NA	NA	NA	NA	NA	NA	NA
Total	102	100.0	13,534	100.0	1,592	100.0	69,090	100.0

*NA-Tracts without household or family income as applicable
Loans where the geographic location is unknown are excluded from this table.

D&B data from 2014 indicates that 10.6% and 16.3% of all area businesses are located in low- and moderate-income census tracts, respectively. As shown in the preceding table, in 2014, bank lending to businesses in both low- and moderate-income tracts exceeded the D&B demand proxies and also was greater than the 2014 aggregate lending levels. The lending distribution is considered excellent.

During 2013, the bank originated 92 small business loans in the assessment area totaling \$10.4 million. D&B data from 2013 indicates that 10.8% and 16.3% of all area businesses are located in low- and moderate-income census tracts, respectively. During 2013, the percentage of bank lending (7.6%) to small businesses located in low-income tracts was less than the 2013 aggregate lending level (9.9%) and the D&B demand proxy in low-income tracts and is considered adequate. Within moderate-income tracts, the bank’s level of lending (16.3%) mirrored the D&B demand proxy and was slightly less than the aggregate lending level (17.6%) and is considered good. Given the limited loan demand in the four area low-income tracts, more weight is assigned to the distribution of lending within moderate-income census tracts, and, overall, this lending distribution is considered good.

On a combined basis, the bank’s small business geographic distribution is considered excellent. In reaching this conclusion, greater weight is given to the bank’s 2014 performance, as UBI originated a larger dollar volume of lending during that year.

Distribution by Borrower Income and Revenue Size of the Business:

The borrower distribution for HMDA and small business lending for each year reviewed is considered good. Overall, the bank’s distribution by borrower income or revenue is considered good.

Distribution of HMDA Loans by Income Level of Borrower

Wheeling, WV-OHMSA (2014)								
Income Categories	Bank				Aggregate			
	#	%	\$(000s)	% \$	#	%	\$(000s)	% \$
HMDA Totals								
Low	5	8.3	210	5.7	217	10.1	11,596	5.1
Moderate	20	33.3	840	22.8	421	19.7	29,334	12.9
Middle	18	30.0	1,089	29.5	567	26.5	53,511	23.6
Upper	17	28.4	1,550	42.0	934	43.7	132,361	58.4
Total	60	100.0	3,689	100.0	2,139	100.0	226,802	100.0
Unknown	7		613		375		52,614	

Percentages (%) are calculated on all loans where incomes are known

Demographic data from the 2010 census indicate that within the assessment area, 19.6% and 19.9% of families are low- and moderate-income, respectively. Overall, although UBI's lending to low-income borrowers was less than the percentages of such families in the market and also less than the aggregate lending percentage, its lending level to moderate-income borrowers well exceeded the percentage of such families and the aggregate lending level. This lending performance is considered excellent.

In 2013, the bank originated 90 HMDA loans totaling \$10.6 million, where borrower incomes were known. Of these loans, four (4.4%) totaling \$48,000 were to low-income borrowers, and 16 (17.8%) totaling \$1.2 million were to moderate-income borrowers. Overall, bank lending to low-income borrowers (4.4%) was less than the percentage of such families in the market (19.6%) and also less than the aggregate lending level (6.9%). However its lending to moderate-income borrowers was only slightly lower than the percentage of such families (19.9%) and the aggregate lending level (18.2%). This lending performance is considered good.

On a combined basis, the bank's distribution by borrower income is considered good as considerably more weight is given to the 2013 performance because of the significantly greater volume in lending activity for that year.

Distribution of Lending by Loan Amount and Size of Business

Wheeling, WV-OHMSA (2014)								
by Revenue	Bank				Aggregate*			
	#	%	\$(000s)	% \$	#	%	\$(000s)	% \$
\$1 Million or Less	42	41.2	4,643	34.3	513	31.4	22,210	32.0
Over \$1 Million	49	48.0	7,627	56.4	NA	NA	NA	NA
Unknown	11	10.8	1,264	9.3	NA	NA	NA	NA
by Loan Size								
\$100,000 or less	61	59.8	3,021	22.3	1,468	89.9	22,790	32.8
\$100,001-\$250,000	30	29.4	5,293	39.1	109	6.7	18,915	27.3
\$250,001-\$1 Million	11	10.8	5,220	38.6	56	3.4	27,706	39.9
Total	102	100.0	13,534	100.0	1,633	100.0	69,411	100.0

* No data is available for Aggregate loans with Revenues over \$1 million and those with Unknown revenues

During 2014, D&B data indicate that 87.6% of all local businesses have revenues that do not exceed \$1 million per year; however, as reflected in the preceding table, aggregate lending indicates that the effective demand for credit for smaller businesses is less than the business data suggests. After excluding large credit card lenders, 2014 data shows that 41.6% of aggregate reported small business loans were to businesses having revenues of \$1 million or less. Compared to the proxies for demand, and considering contextual factors, the bank's level of lending is considered good. UBI's performance during 2013 was substantially similar, and is also considered good.

Community Development Loans:

As previously discussed, opportunities for community development lending are reasonably available within the Wheeling, WV-OH MSA. When considering the bank's capacity, market position, and business strategy, the bank faces no constraints in extending community development loans within the assessment area. During the evaluation period, UBI originated five loans totaling \$176,345 that provided assistance for economic development and services to low- and moderate-income residents of the assessment area. Within this assessment area, the bank extended an adequate level of community development loans during the evaluation period.

INVESTMENT TEST

The institution's investment with the United Venture Fund benefits businesses located throughout the West Virginia statewide area, including this assessment area. UBI also has an equity investment totaling \$100,000 in a CRA Qualified Investment Fund targeted to the Wheeling, WV-OH MSA and an equity investment of \$20,000 in a local CDC fund whose operations also benefit the assessment area. Additionally, UBI holds qualified Fannie Mae and Ginnie Mae investments with \$293,000 allocated to the Wheeling, WV MSA; these instruments are backed by loans that provide affordable housing to residents. Charitable donations totaling \$11,405 and qualifying as community development investments have been made in this market. These donations support organizations whose operations primarily benefit low- and moderate-income people. Overall, considering the bank's market presence and available community development investing opportunities, the investment test is rated low satisfactory.

SERVICE TEST

Within the assessment area, UBI's performance under the service test is rated high satisfactory. Systems for delivering retail banking services are readily accessible to all portions of the assessment area, including low- and moderate-income areas. Also, an adequate level of services is provided by UBI actively participating in community development organizations.

Retail Services:

Delivery systems are readily accessible to all portions of the assessment area. Automated teller machines (ATMs) are available and, through a network, provide customers with 24-hour nationwide access. Bank-by-mail and bank-by-computer services are also offered by the institution. In addition, the institution provides customers with 24-hour telephone access to their accounts through an automated system.

The institution has eight branch offices within this assessment area, of which two (25%) are located in low-income census tracts and one (12.5%) is located in a moderate-income census tract. The distribution of branches is excellent when considering that according to census data, 3.1% and 17.4% of the assessment area's families reside in low- and moderate-income areas, respectively. Branch locations and business hours are considered convenient and meet the needs of the assessment area. Since the previous evaluation, no branch office has been opened or closed.

Community Development Services:

Within the assessment area, UBI and its employees provide an adequate level of support to various local organizations and activities whose operations directly benefit low- and moderate-income residents or encourage micro-enterprise development. These activities include, but are not limited to the following:

- Wheeling Regional Economic Development Corporation – A bank officer serves as a board member of this organization that promotes economic development within the assessment area.

- Elm Grove Business Association – Two bank officers serve in various financial positions for this non-profit organization that cultivates micro-enterprises within the assessment area.
- Crittenton Services, Inc. – A bank officer provides financial expertise for this organization that provides housing and social services for area residents regardless of ability to pay.
- East Wheeling NSP – A bank officer assisted this organization with the FHLB AHP grant program for affordable housing within the assessment area.

MULTISTATE METROPOLITAN AREA

CRA RATING FOR WASHINGTON-BALTIMORE-NORTHERN VIRGINIA, DC-MD-VA-WV-PA CSA²: Satisfactory

The lending test is rated: High Satisfactory

The investment test is rated: High Satisfactory

The service test is rated: High Satisfactory

Major factors supporting the rating include:

- Lending activity is consistent with the bank's capacity and helps meet identified community credit needs within a highly competitive market.
- The geographic distribution of lending is considered excellent while the borrower distribution of loans is considered good overall.
- The bank originated a relatively high level of community development loans.
- The bank maintains a level of qualified investments that good responsiveness in this assessment area.
- Delivery systems and branch locations are readily accessible to all segments of the assessment area.
- An adequate level of participation in qualified community development services benefiting the multistate MSA was noted.

SCOPE OF EXAMINATION

The lending test review considered HMDA and small business loans, originated or purchased, from January 1, 2013, through December 31, 2014. Community development loans made during this period, and qualified community development services provided during the review period, were considered. All qualified investments extended during the review period or outstanding as of the examination date, regardless of when made, were also considered.

DESCRIPTION OF INSTITUTION'S OPERATIONS IN THE WASHINGTON-BALTIMORE-NORTHERN VIRGINIA, DC-MD-VA-WV CSA ASSESSMENT AREA

During 2013, the bank served two separate MSAs that make up the bank's current assessment area: the Washington-Arlington-Alexandria, DC-MD-VA-WV MSA comprised of Jefferson County, WV and the Hagerstown-Martinsburg, MD-WV MSA comprised of Berkeley County, WV and Washington County, MD.

Updated MSA boundaries became effective during 2014, and a new consolidated statistical area (CSA) was designated requiring the bank to adjust its assessment area. This new CSA includes portions of the Hagerstown-Martinsburg, MD-WV MSA and the Washington-Arlington-Alexandria, DC-MD-VA-WV MSA, and together the counties served by the bank make up its Washington-Baltimore-Northern Virginia, DC-MD-VA-WV CSA assessment area. Therefore, the 2014, and current assessment area consists of three counties: Berkeley and Jefferson Counties, WV and Washington County, MD. The bank operates nine full service branches within this market area.

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

Census data for the Washington-Arlington-Alexandria, DC-MD-WV MSA 2013 assessment area show the population totaled 53,498 and the median housing value was \$255,746. The area owner-occupancy rate (69%) exceeded the rates for the entire MSA (59.5%) and the state of West Virginia (62.9%). The area family poverty rate (4.4%) was lower than the MSA rate (5.2%) and the State of West Virginia rate (12.8%). The 2013 median family income for the Washington-Arlington-Alexandria, DC-MD-WV MSA equaled \$105,900. The following tables provide pertinent data regarding the bank's assessment areas during 2013.

Assessment Area Demographics

Washington-Arlington-Alexandria, DC-MD-VA-WV MSA (2013 FFIEC Census Data and 2013 D&B Information)								
Income Categories*	Tract Distribution		Families by Tract		Families < Poverty as a % of Families by Tract		Families by Family Income	
	#	%	#	%	#	%	#	%
Low	1	6.6	802	5.9	17	2.1	3,982	29.3
Moderate	7	46.7	6,894	50.7	387	5.6	3,245	23.9
Middle	7	46.7	5,894	43.4	189	3.2	3,249	23.9
Upper	0	0.0	0	0.0	0	0.0	3,114	22.9
NA	0	0.0	0	0.0	0	0.0		
Total	15	100.0	13,590	100.0	593	4.4	13,590	100.0
	Owner Occupied Units by Tract		Households					
			HHs by Tract		HHs < Poverty by Tract		HHs by HH Income	
	#	%	#	%	#	%	#	%
Low	767	5.2	1,158	6.0	38	3.3	5,940	31.0
Moderate	7,707	51.7	9,983	52.1	887	8.9	3,916	20.4
Middle	6,429	43.1	8,023	41.9	514	6.4	4,270	22.3
Upper	0	0.0	0	0.0	0	0.0	5,038	26.3
NA	0	0.0	0	0.0	0	0.0		
Total	14,903	100.0	19,164	100.0	1,439	7.5	19,164	100.0
	Total Businesses by Tract		Businesses by Tract and Revenue Size					
			Less than or = \$1 Million		Over \$1 Million		Revenue not Reported	
	#	%	#	%	#	%	#	%
Low	120	5.0	110	4.9	4	4.9	6	6.7
Moderate	1,324	54.4	1,235	54.6	47	57.3	42	47.2
Middle	989	40.6	917	40.5	31	37.8	41	46.1
Upper	0	0.0	0	0.0	0	0.0	0	0.0
NA	0	0.0	0	0.0	0	0.0	0	0.0
Total	2,433	100.0	2,262	100.0	82	100.0	89	100.0
	Percentage of Total Businesses:			93.0		3.4		3.6

*NA-Tracts without household or family income as applicable

The Hagerstown-Martinsburg, MD-WV MSA assessment area during 2013 had a population of 251,599, and the median housing value was \$218,334. The area owner-occupancy rate (63.5%) exceeded the rates for the entire MSA (62.6%), the State of West Virginia (62.9%), and the State of Maryland (62.2%). The area family poverty rate (7.4%) was lower than the rate for the MSA (7.7%) and the State of West Virginia rate (12.8%), but higher than the rate for the State of Maryland (5.7%). The 2013 median family income for the Hagerstown-Martinsburg, MD-WV MSA equaled \$66,900.

Assessment Area Demographics

Hagerstown-Martinsburg, MD-WV MSA <i>(2013 FFIEC Census Data and 2013 D&B Information)</i>								
Income Categories*	Tract Distribution		Families by Tract		Families < Poverty as a % of Families by Tract		Families by Family Income	
	#	%	#	%	#	%	#	%
Low	2	4.3	1,184	1.8	424	35.8	12,342	19.2
Moderate	10	21.7	11,359	17.7	1,967	17.3	12,074	18.8
Middle	23	50.0	35,256	54.8	1,891	5.4	13,826	21.5
Upper	10	21.8	16,493	25.7	461	2.8	26,050	40.5
NA	1	2.2	0	0.0	0	0.0		
Total	46	100.0	64,292	100.0	4,743	7.4	64,292	100.0
	Owner Occupied Units by Tract		Households					
			HHs by Tract		HHs < Poverty by Tract		HHs by HH Income	
	#	%	#	%	#	%	#	%
Low	546	0.8	2,465	2.6	763	31.0	20,727	22.0
Moderate	8,896	13.5	19,076	20.3	3,789	19.9	15,897	16.9
Middle	38,635	58.5	50,126	53.2	3,801	7.6	17,030	18.1
Upper	17,961	27.2	22,482	23.9	1,314	5.8	40,495	43.0
NA	0	0.0	0	0.0	0	0.0		
Total	66,038	100.0	94,149	100.0	9,667	10.3	94,149	100.0
	Total Businesses by Tract		Businesses by Tract and Revenue Size					
			Less than or = \$1 Million		Over \$1 Million		Revenue not Reported	
	#	%	#	%	#	%	#	%
Low	446	4.0	397	3.9	35	5.9	14	3.4
Moderate	2,197	19.5	1,935	18.9	147	24.6	115	28.3
Middle	5,761	51.2	5,286	51.6	277	46.4	198	48.6
Upper	2,840	25.3	2,623	25.6	137	22.9	80	19.7
NA	3	0.0	2	0.0	1	0.2	0	0.0
Total	11,247	100.0	10,243	100.0	597	100.0	407	100.0
	Percentage of Total Businesses:			91.1		5.3		3.6

*NA-Tracts without household or family income as applicable

Demographic data presented in this paragraph and the following table reflects the new Washington-Baltimore-Northern Virginia, DC-MD-VA-WV CSA assessment area. According to 2010 census data, the population assessment area totals 305,097 and the median housing value is \$222,916. The area owner-occupancy rate (64.5%) slightly exceeds the rates for the Hagerstown-Martinsburg, MD-WV MSA (63.5%), Washington-Arlington-Alexandria, DC-MD-VA-WV MSA (59.6%), the state of Maryland (62.2%), and the state of West Virginia (62.9%). The area family poverty rate (6.9%) is higher than the rate for the state of Maryland (5.7%) and the Washington-Arlington-Alexandria, DC-MD-VA-WV MSA (5.2%), but lower than the State of West Virginia rate (12.8%) and the Hagerstown-Martinsburg, MD-WV MSA (7.4%). The 2014 median family income for the Hagerstown-Martinsburg, MD-WV MSA and Washington-Arlington-Alexandria, DC-MD-VA-WV MSA equals \$63,500 and \$107,100, respectively. The following table includes pertinent data regarding the bank's current assessment area.

Assessment Area Demographics

Washington-Baltimore-Northern Virginia, DC-MD-VA-WV CSA (2014 FFIEC Census Data and 2014 D&B Information)								
Income Categories*	Tract Distribution		Families by Tract		Families < Poverty as a % of Families by Tract		Families by Family Income	
	#	%	#	%	#	%	#	%
Low	3	4.9	1,986	2.6	441	22.2	16,474	21.2
Moderate	16	26.2	17,386	22.3	2,318	13.3	15,343	19.7
Middle	32	52.5	44,560	57.2	2,223	5.0	17,123	22.0
Upper	9	14.8	13,950	17.9	354	2.5	28,942	37.1
NA	1	1.6	0	0.0	0	0.0		
Total	61	100.0	77,882	100.0	5,336	6.9	77,882	100.0
	Owner Occupied Units by Tract		Households					
			HHs by Tract		HHs < Poverty by Tract		HHs by HH Income	
	#	%	#	%	#	%	#	%
Low	1,313	1.6	3,623	3.2	801	22.1	27,115	23.9
Moderate	15,602	19.3	27,864	24.6	4,604	16.5	20,343	18.0
Middle	48,875	60.4	62,536	55.2	4,544	7.3	21,374	18.9
Upper	15,151	18.7	19,290	17.0	1,157	6.0	44,481	39.2
NA	0	0.0	0	0.0	0	0.0		
Total	80,941	100.0	113,313	100.0	11,106	9.8	113,313	100.0
	Total Businesses by Tract		Businesses by Tract and Revenue Size					
			Less than or = \$1 Million		Over \$1 Million		Revenue not Reported	
	#	%	#	%	#	%	#	%
Low	503	4.2	447	4.1	42	6.2	14	3.4
Moderate	2,951	24.7	2,641	24.4	191	28.1	119	29.2
Middle	6,252	52.4	5,728	52.9	317	46.7	207	50.7
Upper	2,217	18.7	2,021	18.6	128	18.9	68	16.7
NA	2	0.0	1	0.0	1	0.1	0	0.0
Total	11,925	100.0	10,838	100.0	679	100.0	408	100.0
Percentage of Total Businesses:				90.9		5.7		3.4

*NA-Tracts without household or family income as applicable

The assessment area benefits from a diverse economy. Major employers in the area include PNGI Charles Town Gaming, local universities and school systems, health care systems, the Federal government, Citigroup, and Volvo Powertrain North America. Unemployment rates as of September of each year since the previous evaluation are provided in the table below:

Geographic Area	Sept-13	Sept-14	Sept-15
Berkeley County, WV	5.2%	4.9%	4.6%
Jefferson County, WV	4.4%	4.3%	3.8%
Washington County, MD	7.0%	6%	5.4%
Hagerstown-Martinsburg, MD-WV MSA	6.2%	5.6%	5.1%
Washington-Arlington-Alexandria, DC-VA-MD-WV MSA	5.4%	5%	4.3%
State of Maryland	6.3%	5.6%	5%
State of West Virginia	6.1%	5.8%	6.3%

As reflected in the preceding table, unemployment rates have steadily declined during the evaluation period, with the exception of the overall state rates for West Virginia.

Two community officials were contacted from the assessment area during the examination. One contact stated that the area's current economic condition is good; however, the area has become a bedroom community for individuals and families employed within the District of Columbia area looking for reasonable housing options and this has pushed overall living expenses upward. Therefore, existing residents who historically have relied on lower cost of living and employment from manufacturing jobs that are no longer readily available, are having a difficult time keeping up with the cost of living, causing affordable housing assistance options to be in demand. The contact stated banks are active in the area and was not aware of any bank participating in discriminatory acts.

The other housing official contacted stated that the area's current economic conditions are improving, and over the past two years, the number of foreclosures in the area has decreased and more individuals have been reaching out for homebuyer education information and able to obtain residential mortgage loans. The contact mentioned there is a need for homeownership counseling, financial literacy, and affordable housing education, and expressed optimism that local community banks are willing to participate in these activities. The contact stated local financial institutions are active in the area and the office has various relationships and had no evidence of any banks participating in discriminatory acts.

Overall, there is reasonable opportunity for community development loans and investments within the market area. Despite a competitive market, UBI faces no significant constraints in taking advantage of all available community development opportunities.

CONCLUSIONS WITH RESPECT TO PERFORMANCE TESTS WASHINGTON-BALTIMORE-NORTHERN VIRGINIA, DC-MD-VA-WV CSA

LENDING TEST

The institution's lending performance within this assessment area is considered good. This conclusion is based on an evaluation of UBI's lending activity, the geographic and borrower distribution of lending, as well as the level of community development lending, while taking into account the bank's market strategy, area demographic data, and aggregate CRA small business and HMDA loan data.

Lending Activity:

Bank lending activity within this assessment area as measured by number (12.2%) and dollar volume (13%) is slightly less than the percentage of branch offices (14.3%) in the area and higher than the proportion of bank's deposits (8.9%) in the assessment area. However, this level of lending activity is considered good as evidenced by the market share data. As of June 2014, within the Hagerstown-Martinsburg, MD-WV MSA, UBI ranked fifth out of 18 institutions in deposit market share having 8.1% of the assessment area's available Federal Deposit Insurance Corporation (FDIC) insured deposits (credit unions are not included). During that same time period within Jefferson County, West Virginia, which is part of the Washington-Arlington-Alexandria, DC-VA-MD-WV MSA, UBI ranked fourth out of six institutions in deposit market share having 14.1% of the assessment area's available insured deposits. According to 2014 aggregate loan data, within its assessment area, UBI ranked 13th of 295 reporters in residential mortgage loans with 1.7% market share and ninth out of 64 reporters in small business loans with 4.1% market share.

Geographic Distribution:

Overall, the HMDA geographic distribution of lending is considered excellent, while the bank's small business lending distribution is considered good. Given the significantly greater weight given to the bank's HMDA lending based upon its relative dollar volume, overall, the bank's distribution by income level of census tract is considered excellent.

Distribution of HMDA Loans by Income Level of Census Tract

Washington-Baltimore-Northern Virginia, DC-MD-VA-WV CSA (2014)								
Income Categories	Bank				Aggregate			
	#	%	\$(000s)	% \$	#	%	\$(000s)	% \$
	(75) Home Purchase				(5,434)			
Low	3	4.0	215	1.8	50	0.9	5,437	0.6
Moderate	26	34.7	3,982	32.8	951	17.5	154,711	15.8
Middle	44	58.7	7,581	62.4	3,670	67.5	666,736	68.0
Upper	2	2.6	364	3.0	763	14.1	153,261	15.6
	(45) Refinance				(2,885)			
Low	5	11.1	750	9.5	39	1.4	5,527	1.1
Moderate	12	26.7	1,375	17.5	474	16.4	73,416	14.5
Middle	24	53.3	4,974	63.3	1,856	64.3	325,894	64.5
Upper	4	8.9	757	9.7	516	17.9	100,667	19.9
	(24) Home Improvement				(486)			
Low	2	8.3	177	8.5	5	1.0	310	1.3
Moderate	7	29.2	414	19.8	111	22.8	5,109	20.8
Middle	12	50.0	1,461	70.0	302	62.1	15,290	62.3
Upper	3	12.5	35	1.7	68	14.1	3,841	15.6
	(10) Multi-Family				(29)			
Low	2	20.0	485	7.6	5	17.2	1,497	5.0
Moderate	6	60.0	3,167	49.6	15	51.7	9,459	31.9
Middle	2	20.0	2,738	42.8	7	24.1	18,277	61.6
Upper	0	0.0	0	0.0	2	7.0	455	1.5
	HMDA Totals							
Low	12	7.8	1,627	5.7	99	1.1	12,771	0.8
Moderate	51	33.1	8,938	31.4	1,551	17.6	242,695	15.8
Middle	82	53.2	16,754	58.8	5,835	66.0	1,026,197	66.6
Upper	9	5.9	1,156	4.1	1,349	15.3	258,224	16.8
NA*	0	0.0	0	0.0	1	0.0	170	0.0
Total	154	100.0	28,475	100.0	8,835	100.0	1,540,057	100.0

NA*-Tracts without household or family income as applicable

Within this market, home purchase transactions were the primary HMDA loan category by number of loans and dollar volume during 2014 for both the bank and aggregate reporters. The distribution of the bank's home purchase lending is considered excellent due to the penetration of lending activity in low- and moderate-income census tracts. Additionally, refinance and home improvement lending were also considered to have an excellent performance when compared to the aggregate level of lending.

Overall, as reflected in the preceding table, the bank's level of lending within low- and moderate-income census tracts exceeds that of the aggregate and the level of owner occupied housing units (1.6% and 19.3%, respectively) located within assessment area low- and moderate-income tracts. This level of lending is considered excellent.

As previously mentioned, during 2013, the bank served two separate MSAs that make up the current 2014 assessment area: the Washington-Arlington-Alexandria, DC-MD-VA-WV MSA comprised of Jefferson County, WV and the Hagerstown-Martinsburg, MD-WV MSA comprised of Berkeley County, WV and Washington County, MD. Within the Washington-Arlington-Alexandria, DC-MD-VA-WV MSA, the bank originated 57 loans totaling \$12.5 million. The bank had stronger performance within the low-income census tract as six (10.5%) loans were originated in this tract compared to the aggregate

lending level of 2.8%. In the moderate-income census tracts the bank originated 19 (33.3%) loans, compared to an aggregate of 45.4%. According to 2010 census data, 5.2% and 51.7% of owner-occupied units are located in low- and moderate-income tracts, respectively. The bank's level of lending in low- and moderate-income tracts during 2013 within this MSA is considered good overall.

Within the Hagerstown-Martinsburg, MD-WV MSA during 2013, the bank originated 214 loans totaling \$38.3 million. The bank had strong performance within the low- and moderate-income census tracts as four (1.9%) and 30 (14%) loans were originated in such tracts. According to 2010 census data, .8% and 13.5% of owner-occupied units are located in low- and moderate-income tracts respectively. During 2013, the aggregate reporters originated .5% and 11.6% of loans in low- and moderate-income tracts, respectively. UBI's level of lending is considered excellent during 2013 within this assessment area.

Overall, the bank's geographic distribution is considered excellent given the higher lending volume in the assessment areas with excellent performance.

Distribution of Small Business Loans by Income Level of Census Tract

Washington-Baltimore-Northern Virginia, DC-MD-VA-WV CSA (2014)								
Income Categories	Bank				Aggregate			
	#	%	\$(000s)	%\$	#	%	\$(000s)	%\$
Low	3	2.0	950	3.8	167	4.8	5,823	3.6
Moderate	46	31.1	8,810	35.7	777	22.1	40,221	24.6
Middle	84	56.8	13,336	54.0	1,856	52.8	84,809	51.9
Upper	15	10.1	1,599	6.5	711	20.3	32,512	19.9
NA*	0	0.0	0	0.0	1	0.0	20	0.0
Total	148	100.0	24,695	100.0	3,512	100.0	163,385	100.0

*NA-Tracts without household or family income as applicable
Loans where the geographic location is unknown are excluded from this table.

D&B data indicates that 4.2% and 24.7% of all area businesses are located in low- and moderate-income census tracts, respectively. As shown in the preceding table, bank lending in 2014 to businesses in low-income tracts (2%) was somewhat less than the 2014 aggregate lending level (4.8%) and D&B demographic demand proxies. On the other hand, bank lending in 2014 in moderate-income tracts exceeded both the aggregated lending level (22.1%) and the demographic proxy. Given these factors and the significantly greater dollar volume of lending originated within moderate-income tracts during 2014, small business geographic distribution is considered excellent.

Within the Washington-Arlington-Alexandria, DC-MD-VA-WV MSA, the bank originated 45 small business loans totaling \$6.2 million in 2013. Of these loans, UBI originated 4.4% and 35.6%, respectively within low-and-moderate-income census tracts. According to 2010 census data, 5% and 54.4% of small businesses are located in low- and moderate-income tracts respectively. The 2013 aggregate level of lending to small businesses located in low-and-moderate-income tracts equaled 7.1% and 49.1%, respectively. Overall, the bank's level of lending in low- and moderate-income tracts within this MSA during 2013 is considered adequate.

Within the Hagerstown-Martinsburg, MD-WV MSA, UBI originated 84 loans totaling \$13.1 million in 2013. The bank did not originate any small business loans within the two low-income census tracts, and, when compared to the percentage of small businesses located in low-income census tracts (4%) and the aggregate level of lending (5.4%), UBI's level of lending is considered poor. On the other hand, performance within moderate-income census tracts (27.4%) substantially exceeded the aggregate level of lending (18.1%) and the percentage of small businesses located in moderate-income census tracts (19.5%) and is considered excellent. On a combined basis, UBI's level of lending in low- and moderate-income tracts, within this MSA, during 2013 is considered good.

Overall, the bank’s small business geographic distribution performance is considered good. In reaching this conclusion, greater weight is given to the CSA where the volume of lending was significantly higher and the performance was excellent.

Distribution by Borrower Income and Revenue Size of the Business:

Within the market area, the bank’s borrower distribution performance varied from adequate for HMDA to excellent for small business loans. The overall borrower distribution within this assessment area is considered good accounting for the institution’s size, branch locations, effective demand for credit, and relative weight given to the dollar volume of small business loans.

Distribution of HMDA Loans by Income Level of Borrower

Washington-Baltimore-Northern Virginia, DC-MD-VA-WV CSA (2014)								
Income Categories	Bank				Aggregate			
	#	%	\$(000s)	%\$	#	%	\$(000s)	%\$
HMDA Totals								
Low	11	10.1	964	5.6	695	10.2	73,619	6.4
Moderate	26	23.9	2,576	14.9	1,723	25.4	242,683	21.0
Middle	24	22.0	4,846	28.0	1,896	28.0	329,942	28.6
Upper	48	44.0	8,942	51.5	2,468	36.4	508,103	44.0
Total	109	100.0	17,328	100.0	6,782	100.0	1,154,347	100.0
Unknown	45		11,147		2,053		385,710	

Percentages (%) are calculated on all loans where incomes are known

Demographic data from the 2010 census indicates that within the assessment area, 21.2% and 19.7% of families are low- and moderate-income, respectively. Overall, as reflected in the preceding table, UBI’s lending to low-income borrowers (10.1%) is similar to the aggregate lending level but lagged the demographic proxy, while lending to moderate-income borrowers (23.9%) slightly lagged the aggregate lending level, but is greater than the demographic proxy. This level of performance is considered good.

As previously mentioned, the bank served two separate MSAs during 2013, the Washington-Arlington-Alexandria, DC-MD-VA-WV MSA and the Hagerstown-Martinsburg, MD-WV MSA. Within the Washington-Arlington-Alexandria, DC-MD-VA-WV MSA, the bank originated 48 loans totaling \$9.1 million, where borrower incomes were known. Demographic data from the 2010 census indicates that within the assessment area, 29.3% and 23.9% of families are low- and moderate-income, respectively. Overall, UBI’s lending to low- and moderate-income borrowers (16.7% and 20.8%, respectively) lagged both the aggregate lending level (21% and 30.3%, respectively) and the demographic demand proxy. This level of performance is considered adequate.

Within the Hagerstown-Martinsburg, MD-WV MSA, the bank originated 191 loans totaling \$34.2 million, where borrower incomes were known. Demographic data from the 2010 census indicates that within the assessment area, 19.2% and 18.8% of families are low- and moderate-income, respectively. Overall, UBI’s lending to low- and moderate-income borrowers (4.2% and 20.4%, respectively) lagged both the aggregate lending levels (9.5% and 24.4%, respectively) and the demographic proxy and is considered adequate.

Overall, much greater weight is given to the bank’s 2013 performance given the greater dollar volume. Accordingly, UBI’s HMDA borrower distribution performance is considered adequate.

Distribution of Lending by Loan Amount and Size of Business

Washington-Baltimore-Northern Virginia, DC-MD-VA-WV CSA (2014)								
by Revenue	Bank				Aggregate*			
	#	%	\$(000s)	% \$	#	%	\$(000s)	% \$
\$1 Million or Less	94	63.5	15,757	63.8	1,588	44.1	69,264	42.1
Over \$1 Million	40	27.0	7,748	31.4	NA	NA	NA	NA
Unknown	14	9.5	1,190	4.8	NA	NA	NA	NA
by Loan Size								
\$100,000 or less	86	58.1	3,845	15.6	3,265	90.6	47,521	28.9
\$100,001-\$250,000	29	19.6	4,795	19.4	175	4.9	30,411	18.5
\$250,001-\$1 Million	33	22.3	16,055	65.0	164	4.5	86,663	52.6
Total	148	100.0	24,695	100.0	3,604	100.0	164,595	100.0

* No data is available for Aggregate loans with Revenues over \$1 million and those with Unknown revenues

D&B data indicates that 90.9% of all local businesses have revenues that do not exceed \$1 million per year; however, as reflected in the preceding table, aggregate lending indicates that the effective demand for credit for smaller businesses is much less. In this particular market, aggregate data includes lending by credit card lenders. For this reason, data for traditional bank reporters was considered as performance context. According to the 2014 data, excluding large credit card lenders, 53.4% of reported small business loans were to businesses having revenues of \$1 million or less. Revenues were either unknown or in excess of \$1 million for the remaining portion of loans. UBI's level of small business lending (63.5%) with revenues of \$1 million or less is considered excellent taking into consideration proxies for demand and performance context.

Within the Washington-Arlington-Alexandria, DC-MD-VA-WV MSA during 2013, D&B data indicates that 93% of all local businesses have revenues that do not exceed \$1 million per year. The aggregate lending indicates that the effective demand for credit for smaller businesses is much less. In this particular market, aggregate data includes lending by credit card lenders. For this reason, data for traditional bank reporters was considered as performance context. According to the 2013 data, excluding large credit card lenders, aggregate data indicates that 56.5% of reported small business loans were to businesses having revenues of \$1 million or less, compared to 66.7 % for the institution. Revenues were either unknown or in excess of \$1 million for the remaining portion of loans. Taking into consideration proxies for demand and performance context, the bank's level of lending is considered excellent.

Within the Hagerstown-Martinsburg, MD-WV MSA, D&B data indicates that 91.1% of all local businesses have revenues that do not exceed \$1 million per year. The aggregate lending indicates that the effective demand for credit for smaller businesses is much less. In this particular market, aggregate data includes lending by credit card lenders. For this reason, data for traditional bank reporters was considered as performance context. According to the 2013 data, excluding large credit card lenders, 49.4% of reported small business loans were to businesses having revenues of \$1 million or less compared to UBI's lending level of 51.2% to such businesses. Revenues were either unknown or in excess of \$1 million for the remaining portion of loans. Taking into consideration proxies for demand and performance context, the bank's level of lending is considered good.

Overall, much greater weight is given to the bank's 2014 performance given the greater dollar volume. UBI's distribution of small business loans based upon revenue is considered excellent.

Community Development Loans:

As previously discussed, opportunities for community development lending are reasonably available within the Washington-Baltimore-Northern Virginia, DC-MD-VA-WV CSA. When considering the bank's capacity, market position, and business strategy, the bank faces no constraints in extending community development loans within the assessment area. During the evaluation period, the bank originated a relatively high level of community development loans by funding six loans totaling \$1.8 million to organizations whose primary purpose is the provision of affordable housing within the market.

INVESTMENT TEST

UBI holds an equity investment totaling \$1 million in the CRA Qualified Investment Fund targeted to the assessment area. As mentioned previously, the institution's investment with the United Venture Fund benefits businesses located throughout the West Virginia statewide area, including this assessment area. UBI also holds qualified Fannie Mae and Ginnie Mae investments and \$817,000 have been allocated to this assessment area; these instruments help to provide affordable housing to residents. Charitable donations equaling \$51,500 qualifying as community development investments have been made in this market. These donations support organizations whose operations primarily benefit low- and moderate-income people. Overall, the investment test is rated high satisfactory.

SERVICE TEST

The assessment area rating for the service test is high satisfactory. Systems for delivering retail banking services are readily accessible to all portions of the assessment area, including low- and moderate-income areas. Also, an adequate level of services is provided by UBI actively participating in community development organizations.

Retail Services:

Delivery systems are readily accessible to all portions of the assessment area. Automated teller machines (ATMs) are available and, through a network, provide customers with 24-hour nationwide access. Bank-by-mail and bank-by-computer services are also offered by the institution. In addition, the institution provides customers with 24-hour telephone access to their accounts through an automated system.

The institution operates nine branch offices within this assessment area. Three branch offices (33.3%) are located in moderate-income census tracts. Branch locations and business hours are considered convenient and meet the needs of the assessment area. The distribution of branches is excellent when considering that, according to 2010 census data, 2.6% and 22.3% of the assessment area's families reside in low- and moderate-income areas, respectively.

Community Development Services:

UBI and its employees participate in an adequate level of community development service endeavors at the multistate level that benefit this assessment area. These services include:

- Housing Authority of Washington County – A bank officer serves as a board member for this organization that coordinates affordable housing within the assessment area.
- Tri-County Council of Western Maryland – a bank officer serves on the revolving loan fund committee that provides low-interest loans to area small businesses.

STATE OF WEST VIRGINIA

CRA RATING FOR WEST VIRGINIA³: Satisfactory

The lending test is rated: High Satisfactory

The investment test is rated: Low Satisfactory

The service test is rated: Outstanding

Major factors supporting the rating include:

- Lending activity is consistent with bank capacity, and the bank offers a broad spectrum of loan products in an effort to meet local credit needs.
- While performance varies by year, product, and market area, the geographic distribution is considered excellent overall and the borrower lending distribution is considered good overall.
- The bank is a leader in providing community development loans.
- Qualified investment opportunities within individual markets vary, with reasonable opportunity in metropolitan areas and limited opportunity in nonmetropolitan areas. In more rural areas, opportunities that do exist often tend to benefit the statewide or larger regional areas that include the assessment area. When considering available opportunities, the bank maintains an adequate level of qualified investments.
- Delivery systems and branch locations are readily accessible to all segments of the assessment areas.
- UBI is a leader within its market areas in West Virginia in providing community development services.

SCOPE OF EXAMINATION

Reported HMDA and small business loans were analyzed to determine the geographic and borrower distribution of the bank's lending. The reported loan data are from calendar years 2013 and 2014. Farm lending was not included because of limited volume. The institution's efforts to serve its markets through qualified community development loans, investments, and services were also reviewed.

When excluding activity in the multistate MSA assessment areas, the West Virginia assessment areas account for 72.6%, 66.6%, and 73.3% of the institution's overall lending, branches, and deposit volume, respectively. Within the State of West Virginia, the Charleston-Huntington-Ashland, WV-OH-KY CSA, Morgantown, WV MSA, and Braxton, WV NonMSA assessment areas account for 52.7% of lending considered in this evaluation, 41.2% of branches, and 49.4% of deposits. Performance in the state was evaluated by applying the full-scope interagency examination procedures to these three markets.

To arrive at an overall state rating, the full-scope assessment areas were generally weighted based on the dollar volume of lending as well as the percentage of loans originated within the market. The greatest weight was given to the Charleston-Huntington-Ashland, WV-OH-KY CSA assessment area as it accounted for 24.3% of loans by dollar volume and 22.7% of the number of loans evaluated. For the remaining assessment areas subject to limited review procedures, a determination was made as to whether performance was consistent with the assigned state rating.

³ For 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.

DESCRIPTION OF INSTITUTION'S OPERATIONS IN WEST VIRGINIA

The institution operates 42 branches throughout the statewide area. Two (4.8%) offices are located in low-income geographies and nine (21.4%) are located in moderate-income areas. These 42 branch offices account for approximately \$3 billion of the bank's total deposit base.

Based on census data, the West Virginia assessment areas served by the bank have a total population of approximately 1.2 million, including 314,723 families. A majority of the families continue to be middle- and upper-income (61.1%), while low- and moderate-income families each comprise 21.4% and 17.5% of the total, respectively. Within these assessment areas, the owner-occupancy rate is 63.7%. The poverty rate is 13.1% of families. The 2014 median family incomes within the MSAs range from \$49,900 (Beckley, WV MSA) to \$61,000 (Morgantown, WV MSA), while the median family income for nonmetropolitan areas of West Virginia equals \$47,100.

CONCLUSIONS WITH RESPECT TO PERFORMANCE TESTS IN WEST VIRGINIA

LENDING TEST

Overall, the statewide lending test is rated high satisfactory. As previously mentioned, of the three markets reviewed using full-scope procedures, more weight was given to the performance within the Charleston-Huntington-Ashland, WV-OH-KY CSA assessment area. Lending activity is considered good and is measured primarily by proportion of lending in the bank's markets. The borrower distribution of loans is considered good, while the geographic distribution of loans is considered excellent. The provision of community development loans is also considered excellent.

Lending Activity:

Overall, lending activity is considered good and consistent with the bank's capacity. This evaluation considers the bank's lending volume and the proportion of branches and deposits within assessment areas as well as market share.

Geographic and Borrower Distribution:

Overall, UBI's geographic distribution is considered excellent, while the borrower distribution of lending is considered good. When reaching overall conclusions regarding performance in each assessment area, the products were weighted primarily according to their respective dollar volumes by year and overall. Within the markets reviewed, with the exception of the Morgantown, WV MSA, small business loans generally were the largest product by dollar volume, followed by HMDA loans. Therefore in most instances, small business lending performance received the greatest weight.

Community Development Loans:

The bank has been a leader in originating loans that qualify as community development loans. During the evaluation period, in West Virginia UBI funded or renewed 57 community development loans totaling \$38.9 million. The loans helped to address a variety of needs including job creation, micro-enterprise, services targeted to low- and moderate-income residents, and affordable housing. Local lending opportunities are reasonably available when considering competition, bank size, economic conditions, and other area relevant factors. The institution faces no lending constraints relative to its size and business strategy.

INVESTMENT TEST

The institution's level of qualified investments benefiting West Virginia is rated low satisfactory. The institution has eight investments totaling \$5.1 million throughout the state. Charitable donations of \$506,933 were made during the review period to organizations providing community development programs, affordable housing, and micro-enterprise throughout West Virginia. In general, these organizations operate within multiple geographic regions in the state, including the bank's assessment areas.

SERVICE TEST

The statewide rating for the institution under the service test is outstanding. Delivery systems are readily accessible to all portions of the bank's market areas and to people of varying income levels. Products and services offered within the West Virginia markets evaluated using the full-scope procedures are representative of those offered by the institution overall.

The institution and its employees are leaders in the provision of community development services. Activities include participation in numerous organizations that provide housing and other services to low- and moderate-income people and microenterprise development. Further, the bank demonstrates an excellent level of responsiveness to community development needs by actively assisting area organizations in completing applications for various grant programs provided by the FHLBP and FHLBA. These programs provide funding for affordable housing projects throughout several states, including West Virginia. During the evaluation period over 30 such applications were completed and submitted with bank assistance.

METROPOLITAN AREAS

(For metropolitan areas with some or all assessment areas reviewed using full-scope review)

DESCRIPTION OF INSTITUTION'S OPERATIONS IN THE CHARLESTON-HUNTINGTON-ASHLAND, WV-OH-KY CSA ASSESSMENT AREA

During 2013, the bank served three separate assessment areas that make up the bank's current Charleston-Huntington-Ashland, WV-OH-KY CSA assessment area: the Charleston, WV MSA comprised of Boone, Kanawha, Lincoln, and Putnam Counties, WV, the Huntington-Ashland, WV-KY-OH MSA comprised of Cabell and Wayne Counties, WV, as well as, a portion of Lawrence, OH, and a nonmetropolitan county assessment area, Logan County, WV.

Updated MSA boundaries became effective during 2014 that resulted in a new consolidated statistical area (CSA) designation. This new CSA (Charleston-Huntington-Ashland, WV-OH-KY CSA) includes all of the Charleston, WV MSA and the Huntington-Ashland, WV-KY-OH MSA. The 2014 assessment area includes all counties mentioned above from the three separate 2013 assessment areas and combined make-up the Charleston-Huntington-Ashland, WV-OH-KY CSA assessment area for UBI. The bank operates 13 full service branches within this market area, all located in West Virginia.

According to 2010 census data, the Charleston, WV MSA assessment area has a population of 294,898 and a median housing value of \$99,541. The owner-occupancy rate of the assessment area equals 66.4%, which exceeds the rate for the State of West Virginia (62.9%) and nearly equals the rate for the Charleston, WV MSA (66.2%). In the assessment area, 11.1% of families are considered below the poverty level, which is less than the percentages of such families in the state (12.8%) and the MSA (11.4%). The 2013 median family income for the Charleston, WV MSA assessment area equals \$57,900. The following table includes pertinent data regarding this 2013 assessment area.

Assessment Area Demographics

Charleston, WV MSA (2013 FFIEC Census Data and 2013 D&B Information)								
Income Categories*	Tract Distribution		Families by Tract		Families < Poverty as a % of Families by Tract		Families by Family Income	
	#	%	#	%	#	%	#	%
Low	0	0.0	0	0.0	0	0.0	16,531	20.5
Moderate	18	23.7	13,872	17.2	2,824	20.4	14,362	17.8
Middle	41	53.9	47,181	58.4	5,040	10.7	16,681	20.7
Upper	17	22.4	19,672	24.4	1,059	5.4	33,151	41.0
NA	0	0.0	0	0.0	0	0.0		
Total	76	100.0	80,725	100.0	8,923	11.1	80,725	100.0
	Owner Occupied Units by Tract		Households					
			HHs by Tract		HHs < Poverty by Tract		HHs by HH Income	
	#	%	#	%	#	%	#	%
Low	0	0.0	0	0.0	0	0.0	29,199	23.9
Moderate	14,459	15.8	23,776	19.5	5,762	24.2	19,635	16.1
Middle	53,080	58.2	68,420	56.0	9,316	13.6	22,137	18.1
Upper	23,741	26.0	30,014	24.5	2,350	7.8	51,239	41.9
NA	0	0.0	0	0.0	0	0.0		
Total	91,280	100.0	122,210	100.0	17,428	14.3	122,210	100.0
	Total Businesses by Tract		Businesses by Tract and 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	3,547	28.9	3,009	27.8	359	39.9	179	32.5
Middle	5,182	42.3	4,642	43.0	323	35.9	217	39.4
Upper	3,528	28.8	3,155	29.2	218	24.2	155	28.1
NA	0	0.0	0	0.0	0	0.0	0	0.0
Total	12,257	100.0	10,806	100.0	900	100.0	551	100.0
Percentage of Total Businesses:				88.2		7.3		4.5

*NA-Tracts without household or family income as applicable

The Huntington-Ashland, WV-KY-OH MSA assessment area has a population of 201,250 and a median housing value of \$93,305. The owner-occupancy rate of the assessment area equals 61.2%, which is lower than the rate for the State of West Virginia (62.9%), the State of Ohio (61.7%), and the rate for the Huntington-Ashland, WV-KY-OH MSA (62.4%). In the assessment area, 15.5% of families are considered below the poverty level, which is higher than the percentages of such families in West Virginia and Ohio (12.8% and 10.3%, respectively) and the MSA (14.5%). The 2013 median family income for the Huntington-Ashland, WV-KY-OH MSA equals \$50,800. The following table includes pertinent data regarding this 2013 assessment area.

Assessment Area Demographics

Huntington-Ashland, WV-KY-OHMSA								
<i>(2013 FFIEC Census Data and 2013 D&B Information)</i>								
Income Categories*	Tract Distribution		Families by Tract		Families < Poverty as a % of Families by Tract		Families by Family Income	
	#	%	#	%	#	%	#	%
Low	3	5.4	1,091	2.0	493	45.2	12,315	23.1
Moderate	17	30.4	10,394	19.5	2,797	26.9	9,789	18.4
Middle	30	53.6	34,799	65.3	4,470	12.8	10,674	20.0
Upper	6	10.6	7,046	13.2	510	7.2	20,552	38.5
NA	0	0.0	0	0.0	0	0.0		
Total	56	100.0	53,330	100.0	8,270	15.5	53,330	100.0
	Owner Occupied Units by Tract		Households					
			HHs by Tract		HHs < Poverty by Tract		HHs by HH Income	
	#	%	#	%	#	%	#	%
Low	754	1.3	2,782	3.4	1,368	49.2	21,337	26.0
Moderate	10,088	17.7	17,867	21.8	5,401	30.2	13,336	16.3
Middle	37,783	66.3	50,401	61.5	8,307	16.5	13,768	16.8
Upper	8,326	14.7	10,896	13.3	1,119	10.3	33,505	40.9
NA	0	0.0	0	0.0	0	0.0		
Total	56,951	100.0	81,946	100.0	16,195	19.8	81,946	100.0
	Total Businesses by Tract		Businesses by Tract and Revenue Size					
			Less than or = \$1 Million		Over \$1 Million		Revenue not Reported	
	#	%	#	%	#	%	#	%
Low	277	3.9	232	3.7	32	6.1	13	4.3
Moderate	2,009	28.2	1,692	26.9	210	40.2	107	35.1
Middle	3,777	53.1	3,412	54.2	212	40.6	153	50.2
Upper	1,054	14.8	954	15.2	68	13.1	32	10.4
NA	0	0.0	0	0.0	0	0.0	0	0.0
Total	7,117	100.0	6,290	100.0	522	100.0	305	100.0
	Percentage of Total Businesses:			88.4		7.3		4.3

*NA-Tracts without household or family income as applicable

The Logan, WV assessment area has a population of 36,743 and a median housing value of \$79,731. The owner-occupancy rate of the assessment area equals 63.7%, which is slightly higher than the rate for the State of West Virginia (62.9%) and the nonmetropolitan areas of the state (62.2%). In the assessment area, 17.6% of families are considered below the poverty level, which is higher than the percentages of such families in the state (12.8%) and the nonmetropolitan areas of West Virginia (14.9%). The 2013 median family income for nonmetropolitan areas of the State of West Virginia equals \$46,100. The following table includes pertinent data regarding this 2013 assessment area.

Assessment Area Demographics

Logan, WV NonMSA (2013 FFIEC Census Data and 2013 D&B Information)								
Income Categories*	Tract Distribution		Families by Tract		Families < Poverty as a % of Families by Tract		Families by Family Income	
	#	%	#	%	#	%	#	%
Low	0	0.0	0	0.0	0	0.0	2,374	22.6
Moderate	0	0.0	0	0.0	0	0.0	1,683	16.0
Middle	9	100.0	10,514	100.0	1,851	17.6	2,375	22.6
Upper	0	0.0	0	0.0	0	0.0	4,082	38.8
NA	0	0.0	0	0.0	0	0.0		
Total	9	100.0	10,514	100.0	1,851	17.6	10,514	100.0
	Owner Occupied Units by Tract		Households					
			HHs by Tract		HHs < Poverty by Tract		HHs by HH Income	
	#	%	#	%	#	%	#	%
Low	0	0.0	0	0.0	0	0.0	3,505	23.8
Moderate	0	0.0	0	0.0	0	0.0	2,289	15.5
Middle	10,725	100.0	14,740	100.0	3,105	21.1	2,661	18.1
Upper	0	0.0	0	0.0	0	0.0	6,285	42.6
NA	0	0.0	0	0.0	0	0.0		
Total	10,725	100.0	14,740	100.0	3,105	21.1	14,740	100.0
	Total Businesses by Tract		Businesses by Tract and 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	1,021	100.0	892	100.0	73	100.0	56	100.0
Upper	0	0.0	0	0.0	0	0.0	0	0.0
NA	0	0.0	0	0.0	0	0.0	0	0.0
Total	1,021	100.0	892	100.0	73	100.0	56	100.0
	Percentage of Total Businesses:			87.4		7.1		5.5

*NA-Tracts without household or family income as applicable

The current CSA assessment area has a population of 532,891 and a median housing value of \$95,869. The owner-occupancy rate of the assessment area equals 64.3%, which exceeds the rate for the State of West Virginia (62.9%), the State of Ohio (61.7%), the Charleston, WV MSA (63.6%), and is similar to the Huntington-Ashland, WV-KY-OH MSA (64.9%) rate. In the assessment area, 13.2% of families are considered below the poverty level, which is greater than the percentages of such families in West Virginia and Ohio (12.8% and 10.3%, respectively), as well as the Charleston, WV MSA (10.9%). However, rate is lower than the family poverty level for the Huntington-Ashland, WV-KY-OH MSA (14.1%). The 2014 median family income for the Charleston, WV MSA and Huntington-Ashland, WV-KY-OH MSA equals \$57,500 and \$52,700, respectively. The following table includes pertinent data regarding the bank's current assessment area.

Assessment Area Demographics

Charleston-Huntington-Ashland, WV-OH-KY CSA (2014 FFIEC Census Data and 2014 D&B Information)								
Income Categories*	Tract Distribution		Families by Tract		Families < Poverty as a % of Families by Tract		Families by Family Income	
	#	%	#	%	#	%	#	%
Low	4	2.8	1,688	1.2	677	40.1	30,886	21.4
Moderate	34	24.1	23,543	16.3	5,331	22.6	25,687	17.8
Middle	79	56.0	90,505	62.6	11,295	12.5	29,808	20.6
Upper	24	17.1	28,833	19.9	1,741	6.0	58,188	40.2
NA	0	0.0	0	0.0	0	0.0		
Total	141	100.0	144,569	100.0	19,044	13.2	144,569	100.0
	Owner Occupied Units by Tract		Households					
			HHs by Tract		HHs < Poverty by Tract		HHs by HH Income	
	#	%	#	%	#	%	#	%
Low	1,227	0.8	3,669	1.7	1,617	44.1	53,771	24.6
Moderate	24,251	15.3	40,693	18.6	10,748	26.4	35,206	16.1
Middle	99,213	62.4	130,966	59.8	20,621	15.7	38,096	17.4
Upper	34,265	21.5	43,568	19.9	3,742	8.6	91,823	41.9
NA	0	0.0	0	0.0	0	0.0		
Total	158,956	100.0	218,896	100.0	36,728	16.8	218,896	100.0
	Total Businesses by Tract		Businesses by Tract and Revenue Size					
			Less than or = \$1 Million		Over \$1 Million		Revenue not Reported	
	#	%	#	%	#	%	#	%
Low	316	1.8	262	1.7	43	2.9	11	1.4
Moderate	4,693	26.5	3,937	25.4	518	35.3	238	30.2
Middle	8,518	48.0	7,547	48.8	608	41.4	363	46.0
Upper	4,203	23.7	3,726	24.1	300	20.4	177	22.4
NA	0	0.0	0	0.0	0	0.0	0	0.0
Total	17,730	100.0	15,472	100.0	1,469	100.0	789	100.0
	Percentage of Total Businesses:			87.3		8.3		4.4

*NA-Tracts without household or family income as applicable

The assessment area encompasses portions of the two largest metropolitan assessment areas in the State of West Virginia. Major area employers include the State of West Virginia, local area medical centers, Marshall University, local county school systems, the Federal Government, Elk Run Coal Company, Rockspring Development, and Toyota Motor Manufacturing. The following table depicts the September unemployment rates for each year since the previous evaluation.

Geographic Area	Sept-13	Sept-14	Sept-15
Boone County, WV	8.7%	8%	8.8%
Cabell County, WV	5.5%	5.2%	5.1%
Kanawha County, WV	5.5%	5.5%	5.8%
Lincoln County, WV	8.3%	7.8%	9.2%
Logan County, WV	9.1%	9.4%	10.9%
Putnam County, WV	5.1%	5%	5.2%
Wayne County, WV	6.5%	6%	6.5%
Lawrence County, OH	8.7%	6%	5.2%
Charleston, WV MSA	5.9%	5.8%	6.2%
Huntington-Ashland, WV-KY-OH MSA	7.1%	5.8%	5.7%
State of Ohio	7.2%	5.1%	4.3%
State of West Virginia	6.1%	5.8%	6.3%

As shown in the table, local unemployment rates have fluctuated over the previous three years. An affordable housing official was recently contacted to assist in evaluating local credit needs. The contact described the economic conditions in the area as being stable, but the area has experienced some job losses as energy companies downsized staff because of reduced demand. The contact also stated that the area has a need for quality affordable housing. The contact indicated that area financial institutions are reasonably serving the banking needs of the local community.

Discussions with the housing official and reviews of the performance evaluations of other financial institutions having a local presence indicate that local community development opportunities are reasonably available within the bank’s assessment area. Additionally, the bank does not face any constraints in providing community development services or making qualified investments.

CONCLUSIONS WITH RESPECT TO PERFORMANCE TESTS IN THE CHARLESTON-HUNTINGTON-AHSLAND, WV-OH-KY CSA

LENDING TEST

The institution's overall lending performance within this assessment area is considered good. This conclusion is based on the evaluation of the bank’s lending activity, the geographic and borrower lending distribution and the level of community development lending while taking into account the bank’s market strategy, area demographic data, and aggregate CRA small business and HMDA loan data.

Lending Activity:

The percentage of bank offices (20.6%) in the market area and the proportion of bank deposits (26.1%) are generally consistent with the number (22.7%) and dollar volume (24.3%) of lending within the market area. Providing additional context, as of June 2014, UBI ranked second out of 24 institutions in deposit market share having 11.6% of the assessment area’s available Federal Deposit Insurance Corporation (FDIC) insured deposits (credit unions are not included). According to 2014 aggregate loan data, UBI ranked ninth out of 213 reporters in reported residential mortgage loans with a 3.3% market share and seventh out of 57 reporters in reported small business loans with a 6.4% market share. Both market share rankings consider originated and purchased loans.

Geographic Distribution:

Overall, the geographic distribution is considered good for HMDA lending and excellent for small business lending, and on a combined basis, UBI’s geographic distribution is considered excellent; taken into consideration was the overall number and dollar volume for each product and year analyzed in reaching the overall rating.

Distribution of HMDA Loans by Income Level of Census Tract

Charleson-Huntington-Ashland, WV-OH-KY CSA (2014)								
Income Categories	Bank				Aggregate			
	#	%	\$(000s)	%\$	#	%	\$(000s)	%\$
	(185)				Home Purchase (4,799)			
Low	3	1.6	195	0.6	26	0.5	1,809	0.3
Moderate	18	9.7	2,728	8.0	512	10.7	49,178	7.5
Middle	75	40.5	12,391	36.5	2,674	55.7	329,224	50.3
Upper	89	48.2	18,643	54.9	1,587	33.1	273,881	41.9
	(48)				Refinance (3,410)			
Low	2	4.2	122	1.5	18	0.5	1,490	0.4
Moderate	3	6.3	101	1.2	367	10.8	32,465	8.3
Middle	21	43.8	3,454	41.4	2,052	60.2	218,494	56.0
Upper	22	45.7	4,667	55.9	973	28.5	137,674	35.3
	(58)				Home Improvement (996)			
Low	1	1.7	60	2.6	5	0.5	189	0.4
Moderate	12	20.7	340	14.9	153	15.4	5,515	11.6
Middle	29	50.0	1,065	46.7	592	59.4	26,331	55.4
Upper	16	27.6	815	35.8	246	24.7	15,454	32.6
	(11)				Multi-Family (66)			
Low	1	9.1	540	11.7	6	9.1	4,040	5.8
Moderate	4	36.4	387	8.4	13	19.7	9,318	13.3
Middle	2	18.2	1,776	38.4	31	47.0	46,055	65.9
Upper	4	36.3	1,918	41.5	16	24.2	10,482	15.0
	HMDA Totals							
Low	7	2.3	917	1.9	55	0.6	7,528	0.6
Moderate	37	12.3	3,556	7.2	1,045	11.3	96,476	8.3
Middle	127	42.1	18,686	38.0	5,349	57.7	620,104	53.4
Upper	131	43.3	26,043	52.9	2,822	30.4	437,491	37.7
NA*	NA	NA	NA	NA	NA	NA	NA	NA
Total	302	100.0	49,202	100.0	9,271	100.0	1,161,599	100.0

NA*-Tracts without household or family income as applicable

Within this market, home purchase transactions were the largest HMDA loan type extended by the bank and aggregate reporters. The bank’s performance for home purchase and refinance lending are considered good, while home improvement and multi-family lending are excellent.

Census data reveals limited owner-occupied housing within the low-income tract (.8%), but a greater amount of such housing in moderate-income census tracts (15.3%). As reflected in the preceding table, overall, the bank originated seven loans within the low-income census tract and when compared to the aggregate this lending represents excellent lending penetration, as aggregate reporter data confirms very limited effective credit demand for loans within that tract. Bank performance in moderate-income tracts was slightly better than the 2014 aggregate lending level although slightly below the demographic proxy, and the bank’s performance is considered good. UBI’s geographic distribution of HMDA lending in the assessment area during 2014 is considered good overall.

During 2013, the bank served three separate assessment areas that combined comprise the 2014 assessment area: the Charleston, WV MSA comprised of Boone, Kanawha, and Putnam Counties, WV, the Huntington-Ashland, WV-KY-OH MSA comprised of Cabell and Wayne Counties, WV, and the Logan County, WV nonmetropolitan assessment area comprised of only Logan County. There are only middle-income census tracts located in this single county assessment area, therefore the geographic distribution for the county was not considered when evaluating the bank’s 2013 performance.

Within the Charleston, WV MSA assessment area, there are no low-income census tracts. Within the assessment area, UBI originated 212 loans totaling \$43 million during 2013. Of these loans, the bank originated 22 (10.4%) within moderate-income census tracts. Aggregate data indicates 10.7% of reported HMDA loans were extended in moderate-income tracts. Census data indicates that 15.8% of owner-occupied housing in the market is located within moderate-income tracts. The bank’s geographic lending performance is considered good.

Within the Huntington-Ashland, WV-KY-OH MSA, the bank originated 110 loans totaling \$21.2 million. Of these loans, the bank originated four (3.6%) within low-income tracts and 21 (19.1%) in moderate-income tracts. Aggregate data indicates 1.4% and 12.7% of reported HMDA loans within the assessment area were located in low- and-moderate-income tracts, respectively. Census data indicates that 1.3% and 17.7% of owner-occupied housing in the market is located within low- and-moderate-income tracts, respectively. UBI’s performance level is considered excellent.

On a combined basis, greater weight was given to the 2013 performance level, given the larger dollar volume of lending, and overall, the bank’s lending performance is considered good.

Distribution of Small Business Loans by Income Level of Census Tract

Charleston-Huntington-Ashland, WV-OH-KY CSA (2014)								
Income Categories	Bank				Aggregate			
	#	%	\$(000s)	%\$	#	%	\$(000s)	%\$
Low	7	1.9	425	0.7	108	2.0	6,212	1.7
Moderate	100	27.8	20,194	33.0	1,120	21.2	107,567	30.2
Middle	149	41.4	23,125	37.8	2,585	49.0	142,467	40.0
Upper	104	28.9	17,390	28.5	1,458	27.8	99,611	28.1
NA*	NA	NA	NA	NA	NA	NA	NA	NA
Total	360	100.0	61,134	100.0	5,271	100.0	355,857	100.0

*NA-Tracts without household or family income as applicable
Loans where the geographic location is unknown are excluded from this table.

D&B data from 2014 indicates that 1.8% and 26.5% of all area businesses are located in low- and moderate-income census tracts, respectively. In 2014, bank lending to businesses in low- and moderate-income tracts (1.9% and 27.8%, respectively) either was similar or exceeded the 2014 aggregate lending level and D&B demographic demand proxies. This level of lending is considered excellent.

As mentioned previously, UBI served three separate assessment areas during 2013. Within the Charleston, WV MSA assessment area, there are no low-income census tracts. UBI originated 237 loans totaling \$44.6 million. D&B data from 2013 indicated that 28.9% of all area businesses are located in moderate-income census tracts. UBI’s lending to businesses in moderate-income tracts (35.4%) exceeded the 2013 aggregate lending level (24.4%) and D&B demographic demand proxies. This level of lending is considered excellent.

Within the Huntington-Ashland, WV-KY-OH MSA, the bank originated 83 small business loans totaling \$11.3 million. Of these loans, the bank originated five (6%) within low-income tracts and 20 (24.1%) in moderate-income tracts. Aggregate data from 2013 indicates that 5.1% and 27.5% of reported small business loans were extended in low- and moderate-income tracts, respectively. Census data indicates that 3.9% and 28.2% of area businesses in the market are located within low- and moderate-income tracts, respectively. The bank’s geographic lending performance in this assessment area is considered good.

On a combined basis, the bank’s geographic distribution of lending performance is considered excellent, taking into consideration the greater number of loans and dollar volume extended during 2014.

Distribution by Borrower Income and Revenue Size of the Business:

The overall distribution by borrower income and business revenue within this assessment area is considered good. In reaching this conclusion, greater weight was given to the small business lending due to a larger dollar volume of lending.

Distribution of HMDA Loans by Income Level of Borrower

Charleston-Huntington-Ashland, WV-OH-KY CSA (2014)								
Income Categories	Bank				Aggregate			
	#	%	\$(000s)	% \$	#	%	\$(000s)	% \$
HMDA Totals								
Low	21	7.7	460	1.1	660	8.1	37,042	3.9
Moderate	50	18.2	1,750	4.1	1,522	18.7	113,176	11.8
Middle	45	16.4	3,718	8.7	2,154	26.5	216,269	22.6
Upper	158	57.7	36,663	86.1	3,798	46.7	590,048	61.7
Total	274	100.0	42,591	100.0	8,134	100.0	956,535	100.0
Unknown	28		6,611		1,137		205,064	

Percentages (%) are calculated on all loans where incomes are known

Demographic data indicates that within the assessment area, 21.4% and 17.8% of families are low- and moderate-income, respectively. UBI’s lending to low-income borrowers is slightly lower than the 2014 aggregate lending level and the demographic proxy; however, UBI’s lending to moderate-income borrowers was similar to the 2014 aggregate lending level and exceeded the percentage of moderate-income families in the market. The overall level of bank lending is considered good.

In 2013, within the Charleston, WV MSA assessment area the bank originated 183 loans totaling \$34.6 million, where borrower incomes were known. Demographic data shows that 20.5% and 17.8% of all area families are low- and moderate-income. UBI’s level of lending to low- and moderate-income borrowers (1.1% and 13.1%, respectively) was below the level of lending of the aggregate reporters (7.8% and 19.3%, respectively), but is nonetheless considered adequate.

Within the Huntington-Ashland, WV-KY-OH MSA, the bank originated 96 HMDA loans where borrower income was known totaling \$14.2 million during 2013. Of these loans, the bank originated five (5.2%) to low-income borrowers and 16 (16.7%) to moderate-income borrowers. Aggregate data indicates that 7.4% and 16.7% of reported HMDA loans within the assessment area were to low- and moderate-income borrowers, respectively. Census data indicates that 23.1% and 18.4% of area families in the market are located within low- and moderate-income tracts. UBI’s performance level is considered good.

Within the Logan County, WV assessment area, the bank reported eight loans totaling \$512,000. Of these loans, none were extended to low- or moderate-income borrowers, and, this level of lending is considered poor when considering the percentage of low- and moderate-income families (22.6% and 16%, respectively) and the aggregate level of lending (5.9% and 11.4%, respectively).

On a combined basis, overall, the bank’s HMDA borrower distribution lending performance is considered adequate given the greater dollar volume associated with combined 2013 lending and the relative performance levels of each market.

Distribution of Lending by Loan Amount and Size of Business

Charleston-Huntington-Ashland, WV-OH-KY CSA (2014)								
by Revenue	Bank				Aggregate*			
	#	%	\$(000s)	% \$	#	%	\$(000s)	% \$
\$1 Million or Less	195	54.2	24,471	40.0	2,150	38.8	119,462	33.1
Over \$1 Million	133	36.9	32,597	53.3	NA	NA	NA	NA
Unknown	32	8.9	4,066	6.7	NA	NA	NA	NA
by Loan Size								
\$100,000 or less	204	56.7	10,457	17.1	4,791	86.4	81,841	22.7
\$100,001-\$250,000	84	23.3	14,518	23.7	362	6.5	63,359	17.5
\$250,001-\$1 Million	72	20.0	36,159	59.2	395	7.1	216,053	59.8
Total	360	100.0	61,134	100.0	5,548	100.0	361,253	100.0

* No data is available for Aggregate loans with Revenues over \$1 million and those with Unknown revenues

D&B data indicates that 87.3% of all local businesses have revenues that do not exceed \$1 million per year. In 2014, 38.8% of aggregate reported small business loans were to businesses with annual revenues of \$1 million or less. The remaining loans were to businesses that either had revenues exceeding \$1 million or revenues were unknown. Excluding credit card lenders, 48.8% of reported small business loans were to businesses having revenues of \$1 million or less. With 54.2% of its 2014 small business loans made to businesses with annual revenues of \$1 million or less, the bank's level of lending is considered good.

The performance for 2013 is substantially similar within the Charleston, WV MSA and Huntington-Ashland, WV-KY-OH MSA to that of the 2014 performance, and is also considered good.

Within the Logan County, WV assessment area, the bank extended two small business loans totaling \$300,000, but neither loan was to a business with annual revenues of \$1 million or less. Given the aggregate level of lending (30.7%), to such businesses and, the percentage of such businesses (87.4%) located in the assessment area, this level of lending is considered poor.

Despite the poor performance in Logan County, overall on a combined basis, the small business borrower distribution of lending is considered good, given the limited volume in the Logan County assessment area and the good performance in the other assessment areas in 2013 and the good performance in 2014.

Community Development Lending:

As previously discussed, opportunities for community development lending are reasonably available within the Charleston-Huntington-Ashland, WV-OH-KY CSA. When considering the bank's capacity, market position, and business strategy, the bank faces no constraints in extending community development loans within the assessment area. During the evaluation period the bank was a leader in making community development loans within this market. Seventeen community development loans totaling \$7.4 million were originated within the assessment area during the evaluation period. The loans provided funding for organizations whose primary purpose is either affordable housing or the provision of services to low- and moderate-income individuals.

INVESTMENT TEST

As mentioned previously, UBI's investment with the United Venture Fund benefits businesses located throughout the West Virginia statewide area, including this assessment area. Additional investments with this assessment area include equity investments totaling \$459,000 in the CRA Qualified Investment Fund targeted to the assessment area and a portion of an investment in CAHEC (\$790) which benefits

the market area through funded projects in Kanawha County. In addition, the bank maintains a \$1 million investment in Qualified Zone Academy Bonds that benefits Logan County. UBI also holds a qualified Ginnie Mae investment and a portion of the investment (\$255,000) has been designated to benefit this assessment area; the instrument is backed by loans that provide affordable housing to residents. Charitable donations of \$117,085 have also been made in this market. These donations support organizations whose operations primarily benefit low- and moderate-income people and/or areas or provide for microenterprise development. When considering investment opportunities and market presence, UBI's level of investments is considered adequate and is responsive to area community development needs.

SERVICE TEST

Within the assessment area, UBI's performance under the service test is considered excellent. Systems for delivering retail banking services are readily accessible to essentially all portions of the assessment area, including low- and moderate-income areas. Also, UBI is a leader in providing services that include active participation in community development organizations.

Retail Services:

Delivery systems are readily accessible to all portions of the assessment area. ATMs are available and, through a network, provide customers with 24-hour nationwide access. Bank-by-mail and bank-by-computer services are also offered by the institution. In addition, the institution provides customers with 24-hour telephone access to their accounts through an automated system. The institution has 13 full-service branches within this assessment area, three of which (23.1%) are located in moderate-income census tracts. The distribution of branches is excellent when considering 2010 census data that indicate 1.2% and 16.3% of the assessment area's families reside in low- and moderate-income areas, respectively. Branch locations and business hours are considered convenient and meet the needs of the assessment area. No branch office was opened or closed in this market since the previous evaluation.

Community Development Services:

UBI and its employees are leaders in providing activities that qualify as community development service endeavors within the assessment area. These activities include but are not limited to the following:

- American Business Club Charleston – A bank employee provides financial counseling to this non-profit service organization whose purpose includes the promotion of creating mobility and independence for primarily low- and moderate-income disabled residents of Charleston.
- Charleston Area Alliance – A bank officer serves on the board of directors for this organization that oversees economic redevelopment efforts including infrastructure improvements.
- Discover the Real WV – A bank officer serves on the board of this organization that provides educational resources and operates a venture capital fund for prospective entrepreneurs, most of whom will operate small businesses.
- Rea of Hope Fellowship Home – A bank officer assisted this organization with the FHLB AHP grant program for affordable housing within the assessment area.
- West Virginia Housing Development – Two bank officers serve in separate capacities as board members of this organization whose mission is to facilitate the development of affordable housing options for low- and moderate-income families within Charleston and Huntington.

- Huntington Housing Authority – A bank officer serves as a board member of this organization whose mission is to facilitate the development of affordable housing options for low- and moderate-income families within Huntington.
- Within this assessment area, a bank officer assists multiple non-profit affordable housing organizations with completing FHLB AHP grant applications.
- Natural Capital Investment Fund – A bank officer is a board member of this organization that provides financing to small businesses.
- Boys and Girls Club of Huntington – A bank officer is a board member of this organization that provides services to residents of the assessment area, many whom are low- and moderate-income residents of the assessment area.
- Huntington Area Development – A bank officer sits on the executive board of this organizations economic development group.
- On Trac – A bank officer is a board member for the local chapter for this state sponsored effort that oversees economic redevelopment endeavors within the assessment area.
- Cammack Children’s Center – A bank officer is a board member for this organization that provides local children housing and social services within the assessment area.
- Lincoln Economic Development Authority – A bank officer is a board member for this organization that provides leadership for economic redevelopment within the county.
- Man Merchants Association – A bank officer is a board member for this organization that provides leadership for economic redevelopment and job creation within Logan County.
- LEASA – A bank officer is a board member for this organization that provides emergency services within Logan County.
- Charleston YWCA & Kanawha Valley YMCA – Two bank employees serve on the finance and/or audit committee of these nonprofit organizations that provides free community youth programs to many low- and moderate-income children who live within the assessment area.
- The Counseling Connection – A bank employee serves as a board member for this organization that provides financial counseling to residents of the local community within the greater Kanawha Valley.
- Women’s Health Center of West Virginia – Charleston – A bank officer serves as a board member for this non-profit organization that provides health care services to low- and moderate-income residents.
- Lincoln County Economic Development Authority – One employee serves as a board member of this organization which focuses on job creation and micro-enterprise development within the county.

**DESCRIPTION OF INSTITUTION'S OPERATIONS IN MORGANTOWN, WV MSA
ASSESSMENT AREA**

The Morgantown, WV MSA assessment area includes all of Monongalia and Preston Counties, West Virginia, which comprises the entire MSA. The bank operates seven full-service branches within the market. As of June 2014, UBI ranked first in deposit market share having 27% of the assessment area's available FDIC insured deposits (credit union deposits are not included). According to the most current census data, the assessment area has a population of 129,709 and a median housing value of \$121,384. The owner-occupancy rate of the assessment area equals 55.1%, which is less than the rate for the State of West Virginia (62.9%). The overall family poverty rate of the MSA (9.1%) is less than that of the state (12.8%). The 2013 and 2014 median family incomes for the MSA equal \$64,400 and \$61,000, respectively. The following table includes pertinent data regarding the bank's assessment area.

Assessment Area Demographics

Morgantown, WV MSA <i>(2014 FFIEC Census Data and 2014 D&B Information)</i>								
Income Categories*	Tract Distribution		Families by Tract		Families < Poverty as a % of Families by Tract		Families by Family Income	
	#	%	#	%	#	%	#	%
Low	2	6.3	513	1.8	160	31.2	5,830	21.0
Moderate	5	15.6	4,740	17.1	582	12.3	4,890	17.6
Middle	17	53.1	16,224	58.4	1,435	8.8	5,578	20.1
Upper	7	21.9	6,311	22.7	345	5.5	11,490	41.3
NA	1	3.1	0	0.0	0	0.0		
Total	32	100.0	27,788	100.0	2,522	9.1	27,788	100.0
	Owner Occupied Units by Tract		Households					
			HHs by Tract		HHs < Poverty by Tract		HHs by HH Income	
	#	%	#	%	#	%	#	%
Low	352	1.1	3,106	6.5	1,835	59.1	13,448	28.1
Moderate	4,952	15.8	7,410	15.5	1,504	20.3	6,640	13.9
Middle	18,562	59.2	26,352	55.0	4,174	15.8	7,257	15.1
Upper	7,479	23.8	10,814	22.5	2,031	18.8	20,578	42.9
NA	36	0.1	241	0.5	213	88.4		
Total	31,381	100.0	47,923	100.0	9,757	20.4	47,923	100.0
	Total Businesses by Tract		Businesses by Tract and Revenue Size					
			Less than or = \$1 Million		Over \$1 Million		Revenue not Reported	
	#	%	#	%	#	%	#	%
Low	420	7.5	368	7.3	29	8.3	23	10.3
Moderate	936	16.7	815	16.2	82	23.4	39	17.4
Middle	3,002	53.5	2,708	53.8	185	52.9	109	48.7
Upper	1,232	22.0	1,126	22.4	54	15.4	52	23.2
NA	16	0.3	15	0.3	0	0.0	1	0.4
Total	5,606	100.0	5,032	100.0	350	100.0	224	100.0
Percentage of Total Businesses:				89.8		6.2		4.0

*NA-Tracts without household or family income as applicable

Residents of the assessment area benefit from employment opportunities at West Virginia University and West Virginia University Hospitals, as well as retail establishments and local and federal government offices. The table below shows unemployment rates at yearly intervals since September 2013. Unemployment rates have fluctuated during the period:

Geographic Area	Sept-13	Sept-14	Sept-15
Monongalia County, WV	4.3%	4.2%	4.6%
Preston County, WV	5.4%	5%	5.4%
Morgantown, WV MSA	4.5%	4.4%	4.8%
State of West Virginia	6.1%	5.8%	6.3%

A local economic development official was contacted during the evaluation to discuss local market conditions and community credit needs. The contact noted a robust economy within Morgantown created by commercial real estate lending, health care, and the University, but did note the continued need for small business lending within the area. Despite this observation, the contact indicated that area banks are meeting the local credit needs of the community.

Based on the discussion with the local community development official and reviews of the performance evaluations of other financial institutions having a local presence, opportunities for local community development activities, including loans and investments, are reasonably available, and UBI has no significant constraints relative to making community development loans or investments.

CONCLUSIONS WITH RESPECT TO PERFORMANCE TESTS IN MORGANTOWN, WV MSA ASSESSMENT AREA

LENDING TEST

The institution's overall lending performance within this assessment area is considered good. This conclusion is based on the evaluation of lending activity, geographic and borrower distribution, and the level of community development lending while taking into account the bank's market strategy, area demographic data, and aggregate CRA small business and HMDA loan data.

Lending Activity:

Bank lending activity based on loan volume by number (17.8%) and dollar (28.1%) within this assessment area exceeds both the bank's percentage of branch offices (11.1%) and the percentage of deposits (16.6%) in the area. According to 2014 market share data, the institution ranked third out of 138 reporters in reported mortgage lending with a 9.3% market share and first out of 45 reporters in reported small business loans with an 11.8% market share. Both market share rankings consider originated and purchased loans. According to 2013 data, the institution ranked fourth out of 148 reporters in reported mortgage lending with a 7.7% market share and first out of 37 reporters in reported small business loans with a 13.6% market share. Overall, lending activity is considered excellent

Geographic Distribution:

The geographic distribution of the bank's small business lending is considered good, while its HMDA lending is considered excellent. The overall geographic loan distribution within this assessment area is considered excellent. In reaching this conclusion, slightly greater weight was given to the HMDA lending performance due to a larger dollar volume of lending.

Distribution of HMDA Loans by Income Level of Census Tract

Morgantown, WV MSA (2014)								
Income Categories	Bank				Aggregate			
	#	%	\$(000s)	% \$	#	%	\$(000s)	% \$
	(166)				(1,838)			
	Home Purchase							
Low	12	7.2	2,849	8.9	59	3.2	10,559	3.1
Moderate	22	13.3	3,598	11.2	222	12.1	34,193	10.0
Middle	81	48.8	13,266	41.4	914	49.9	150,683	44.1
Upper	51	30.7	12,353	38.5	638	34.8	146,608	42.8
	(45)				(799)			
	Refinance							
Low	4	8.9	489	8.0	15	1.9	2,237	1.8
Moderate	9	20.0	691	11.2	95	11.9	10,832	8.5
Middle	13	28.9	1,771	28.8	434	54.3	63,602	49.9
Upper	19	42.2	3,199	52.0	255	31.9	50,789	39.8
	(41)				(191)			
	Home Improvement							
Low	0	0.0	0	0.0	3	1.6	127	0.8
Moderate	7	17.1	589	21.3	35	18.3	1,905	12.6
Middle	19	46.3	1,266	45.7	108	56.5	8,543	56.7
Upper	15	36.6	913	33.0	45	23.6	4,502	29.9
	(14)				(31)			
	Multi-Family							
Low	5	35.7	10,866	47.7	11	35.5	35,092	56.5
Moderate	3	21.4	1,503	6.6	8	25.8	9,657	15.5
Middle	4	28.6	9,438	41.4	8	25.8	10,983	17.7
Upper	2	14.3	986	4.3	4	12.9	6,426	10.3
	HMDA Totals							
Low	21	7.9	14,204	22.3	88	3.1	48,015	8.8
Moderate	41	15.4	6,381	10.0	360	12.6	56,587	10.3
Middle	117	44.0	25,741	40.4	1,464	51.2	233,811	42.6
Upper	87	32.7	17,451	27.3	942	32.9	208,325	38.0
NA*	0	0.0	0	0.0	7	0.2	1,588	0.3
Total	266	100.0	63,777	100.0	2,861	100.0	548,326	100.0

NA*-Tracts without household or family income as applicable

Home purchase loans were the largest HMDA product by volume during 2014 for UBI and aggregate lenders. Refinance and home improvement lending accounted for lesser volume for both the bank and the aggregate during 2014. When evaluating UBI's lending in low- and moderate-income tracts across the different product types, home purchase and refinance lending are considered excellent, while home improvement lending is considered good.

As reflected in the preceding table, overall, the bank's lending performance in low- and moderate-income tracts substantially exceeded the 2014 aggregate lending level. UBI's lending in such tracts also substantially exceeded the percentage of owner-occupied housing units located in low-income tracts (1.1%) and was similar to percentage of owner-occupied housing units in moderate-income tracts (15.8%). This level of lending is considered excellent. The bank's 2013 performance is substantially similar.

Distribution of Small Business Loans by Income Level of Census Tract

Morgantown, WV MSA (2014)								
Income Categories	Bank				Aggregate			
	#	%	\$(000s)	% \$	#	%	\$(000s)	% \$
Low	14	6.5	2,617	8.8	115	6.6	5,549	6.6
Moderate	27	12.6	4,581	15.4	268	15.4	13,661	16.2
Middle	97	45.1	13,393	45.1	911	52.3	41,857	49.8
Upper	77	35.8	9,106	30.7	442	25.3	22,844	27.2
NA*	0	0.0	0	0.0	7	0.4	159	0.2
Total	215	100.0	29,697	100.0	1,743	100.0	84,070	100.0

*NA-Tracts without household or family income as applicable
Loans where the geographic location is unknown are excluded from this table.

D&B data from 2014 indicates that 7.5% and 16.7% of all area businesses are located in low- and moderate-income census tracts. As shown in the preceding table, in 2014, bank lending to businesses in those tracts was slightly below both the D&B percentage and 2014 aggregate lending level but is nonetheless considered good. The bank’s 2013 performance is slightly different, in that bank lending to businesses in low-income tracts (9.6%) exceeded both the D&B percentage and the 2013 aggregate lending level (7.7%). UBI’s level of small business lending in moderate-income tracts (16.1%) was slightly less than the D&B figure and the 2013 aggregate lending level (16.7%). This level of lending, similar to the 2014 level of lending is considered good, and overall, the loan penetration in low- and moderate-income areas during the two-year period reflects a good distribution of small business loans.

Distribution by Borrower Income and Revenue Size of the Business:

The overall distribution by borrower income and business revenue within this assessment area is considered good, given the institution’s size, branch locations, and the effective demand for credit. In reaching this conclusion, greater weight was given to the bank’s HMDA lending performance, which was considered good, and which had a greater combined two-year dollar volume when compared to small business lending dollar volume.

Distribution of HMDA Loans by Income Level of Borrower

Morgantown, WV MSA (2014)								
Income Categories	Bank				Aggregate			
	#	%	\$(000s)	% \$	#	%	\$(000s)	% \$
HMDA Totals								
Low	12	6.6	749	2.5	111	4.8	7,289	1.9
Moderate	27	14.8	2,442	8.3	355	15.3	34,241	8.8
Middle	39	21.4	4,947	16.7	604	26.1	83,327	21.4
Upper	104	57.2	21,457	72.5	1,243	53.8	264,500	67.9
Total	182	100.0	29,595	100.0	2,313	100.0	389,357	100.0
Unknown	84		34,182		548		158,969	

Percentages (%) are calculated on all loans where incomes are known

Demographic data indicates that within the assessment area, 21% and 17.6% of families are low- and moderate-income, respectively. UBI’s lending to both low- and moderate-income borrowers was less than the percentages of such families in the market; however, as reflected in the previous table, the bank’s level of lending to low-income borrowers was greater than the 2014 aggregate lending level, but slightly less than the aggregate lending level to moderate-income borrowers. The bank’s 2014 level of lending is considered good. UBI’s 2013 level of lending to low- and moderate-income borrowers was substantially similar.

Distribution of Lending by Loan Amount and Size of Business

Morgantown, WV MSA (2014)								
by Revenue	Bank				Aggregate*			
	#	%	\$(000s)	% \$	#	%	\$(000s)	% \$
\$1 Million or Less	148	68.8	17,292	58.2	726	40.2	35,428	41.8
Over \$1 Million	52	24.2	10,583	35.6	NA	NA	NA	NA
Unknown	15	7.0	1,822	6.2	NA	NA	NA	NA
by Loan Size	Bank				Aggregate*			
\$100,000 or less	147	68.4	6,216	20.9	1,622	89.8	25,834	30.5
\$100,001-\$250,000	36	16.7	5,981	20.1	104	5.8	17,024	20.1
\$250,001-\$1 Million	32	14.9	17,500	59.0	80	4.4	41,853	49.4
Total	215	100.0	29,697	100.0	1,806	100.0	84,711	100.0

* No data is available for Aggregate loans with Revenues over \$1 million and those with Unknown revenues

According to 2014 D&B data, 89.8% of all businesses have revenues that do not exceed \$1 million per year. As indicated in the preceding table, UBI extended 68.8% of its small business loans to businesses with annual revenues of \$1 million or less during the review period. According to 2014 aggregate small business data, 40.2% of reported loans were to businesses with annual revenues of \$1 million or less. The remaining loans were to businesses that either had revenues exceeding \$1 million or revenues were unknown. By excluding specialized credit card lenders, the lending by the remaining traditional lenders was considered for performance context. For this group of lenders, 54.5% of reported small business loans were to businesses having revenues of \$1 million or less. The bank's level of lending is considered excellent, and the 2013 performance is substantially similar.

Community Development Lending:

As previously discussed, opportunities for community development lending are reasonably available within the Morgantown, WV MSA. When considering the bank's capacity, market position, and business strategy, the bank faces no constraints in extending community development loans within the assessment area. During the evaluation period, nine qualified community development loans were originated or renewed, totaling \$23.3 million within the assessment area. This level of community development lending is considered excellent and provided funding for organizations whose purposes were primarily the provision of economic development services, affordable housing, or social services for low- and moderate-income individuals.

INVESTMENT TEST

The institution's investment with the United Venture Fund benefits businesses located throughout the West Virginia statewide area, including this assessment area. A portion, totaling \$164,000, from the bank's \$2.5 million investment in the CRA Fund is allocated to benefit this assessment area. Charitable donations of \$35,406 have also been made that are considered qualified community development investments. These donations support organizations whose operations primarily benefit low- and moderate-income people and/or areas or provide for small business development. When considering investment opportunities and market presence, UBI's level of investments is considered adequate.

SERVICE TEST

Within the assessment area, UBI's performance under the service test is considered excellent. Systems for delivering retail banking services are readily accessible to all portions of the assessment area, including low- and moderate-income areas. Also, UBI provides a high level of services within the assessment area through active participation in several community development organizations.

Retail Services:

Delivery systems are readily accessible to all portions of the assessment area. ATMs are available and, through a network, provide customers with 24-hour nationwide access. Bank-by-mail and bank-by-computer services are also offered by the institution. In addition, the institution provides customers with 24-hour telephone access to their accounts through an automated system.

The institution has seven full service offices within this assessment area, two (28.6%) of which are located in low-income tracts and one (14.3%) of which is located in a moderate-income tract. The distribution of branches is excellent when considering that 1.8% and 17.1% of the assessment area's families reside in low- and moderate-income areas according to the 2010 census. Branch locations and business hours are considered convenient and meet the needs of the assessment area. No branches have been opened or closed since the previous evaluation.

Community Development Services:

UBI is a leader of community development service endeavors within the assessment area. These activities include but are not limited to the following:

- United Way of Monongalia and Preston Counties – A bank officer provides financial expertise to this organization.
- Mountaineer Boys and Girls Club – A bank officer is a board member for this organization who serves local at risk children.
- Salvation Army – A bank officer serves on the executive board committee for the local chapter organization.
- Empty Bowls – Various bank employees participate with fund raising events that create meals for local low- and- moderate-income residents.
- Pace Enterprises, Inc. – A bank officer serves as a board member with this organization whose purpose is to provide employment skill training, job placement, and find employment opportunities for disabled residents, many who are low- and moderate-income.
- Monongalia County Habitat for Humanity – A bank officer is a member of the family selection committee for this local chapter.
- Monongalia Youth Services Center – A bank officer serves on the finance committee for this organization who provides children with emergency and temporary shelter.
- Fairmont Morgantown Housing Authority – Various bank officers and employees provided their financial expertise with this organization.
- A bank officer assists veterans, many whom are low- and-moderate-income residents, with the completion of FHLBA grant applications for home purchases and home rehabilitation projects; since the previous evaluation six such applications have been funded totaling over \$70,000 in grant money.
- Monongalia Child Advocacy Center – A bank officer serves on the board committee for this organization that provides social services to local low- and- moderate-income children.

METROPOLITAN AREAS

(For each metropolitan area where no assessment areas were reviewed using full-scope review)

DESCRIPTION OF INSTITUTION’S OPERATIONS IN METROPOLITAN AREAS OF WEST VIRGINIA

UBI’s assessment areas in the Beckley, WV MSA, Parkersburg-Marietta-Vienna, WV-OH MSA, and Steubenville-Weirton, OH-WV MSA were reviewed using the limited review examination procedures. Information detailing the composition of the assessment areas is included in **APPENDIX E** of this report. Information about loan volume, branches, and deposits are included in **APPENDIX D** of this report.

CONCLUSIONS WITH RESPECT TO PERFORMANCE TESTS IN METROPOLITAN AREAS OF WEST VIRGINIA

The following table indicates for each test whether performance in an assessment area was generally below, consistent with, or exceeded performance within the State of West Virginia overall. In the cases where performance was considered below, the overall performance for the assessment area is considered adequate. Facts and data reviewed, including performance and demographic information, can be found in **APPENDIX C** of this report. Conclusions regarding performance, which did not impact the overall West Virginia State rating, are as follows:

Assessment Area	Lending Test	Investment Test	Service Test
Beckley, WV MSA	Below	Consistent	Consistent
Steubenville-Weirton, OH-WV MSA	Consistent	Consistent	Below
Parkersburg-Marietta-Vienna, WV-OH MSA	Consistent	Consistent	Consistent

NONMETROPOLITAN STATEWIDE AREA

(If some or all of the assessment areas within the nonmetropolitan statewide area were reviewed using full-scope review)

DESCRIPTION OF INSTITUTION'S OPERATIONS IN THE BRAXTON, WV NONMETROPOLITAN ASSESSMENT AREA

The Braxton, WV NonMSA assessment area includes all portions of Braxton, Gilmer, Harrison, Lewis, Nicholas, Ritchie, and Webster Counties, West Virginia. The bank operates six full-service branches within the market. According to census data, the assessment area has a population of 154,523 and a median housing value of \$82,228. The owner-occupancy rate of the assessment area equals 62.3%, which is less than the rate for West Virginia (62.9%) and exceeds the rate for the nonmetropolitan areas of West Virginia (61.4%). The overall family poverty rate of the assessment area (15.6%) exceeds the statewide nonmetropolitan area rate (14.7%) and the State of West Virginia rate (12.8%). The 2014 median family income for the nonmetropolitan areas of West Virginia equals \$47,100.

During 2013, the assessment area included all of the counties mentioned above, as well as, Fayette and Raleigh Counties, WV; OMB MSA definitional changes that occurred between 2013 and 2014 removed the two counties, and both are now included in the Beckley WV MSA. Therefore, as defined in 2013, the assessment area census data shows a population of 279,421 and a median housing value of \$80,811. The owner-occupancy rate of the assessment area equaled 63.7%, which exceeded the rates for West Virginia (62.9%) and the nonmetropolitan areas of West Virginia (62.2%). The overall family poverty rate of the assessment area (15.4%) was comparable to the statewide nonmetropolitan area rate (14.9%) and exceeded the State of West Virginia rate (12.8%). The 2013 median family income for the nonmetropolitan areas of West Virginia equals \$46,100.

The following tables include pertinent demographic data regarding the bank's assessment areas.

Assessment Area Demographics

Braxton, WV NonMSA								
<i>(2013 FFIEC Census Data and 2013 D&B Information)</i>								
Income Categories*	Tract Distribution		Families by Tract		Families < Poverty as a % of Families by Tract		Families by Family Income	
	#	%	#	%	#	%	#	%
Low	0	0.0	0	0.0	0	0.0	16,640	22.0
Moderate	10	13.5	7,860	10.4	1,962	25.0	12,528	16.6
Middle	48	64.9	50,051	66.3	8,099	16.2	14,468	19.2
Upper	16	21.6	17,633	23.3	1,581	9.0	31,908	42.2
NA	0	0.0	0	0.0	0	0.0		
Total	74	100.0	75,544	100.0	11,642	15.4	75,544	100.0
	Owner Occupied Units by Tract		Households					
			HHs by Tract		HHs < Poverty by Tract		HHs by HH Income	
	#	%	#	%	#	%	#	%
Low	0	0.0	0	0.0	0	0.0	26,655	24.1
Moderate	8,171	9.7	11,862	10.7	3,330	28.1	18,119	16.4
Middle	56,354	66.8	73,475	66.4	14,132	19.2	17,056	15.4
Upper	19,862	23.5	25,387	22.9	3,173	12.5	48,894	44.1
NA	0	0.0	0	0.0	0	0.0		
Total	84,387	100.0	110,724	100.0	20,635	18.6	110,724	100.0
	Total Businesses by Tract		Businesses by Tract and 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	1,529	13.9	1,341	13.7	117	16.7	71	15.0
Middle	6,691	60.9	5,970	60.8	403	57.6	318	67.1
Upper	2,775	25.2	2,510	25.5	180	25.7	85	17.9
NA	0	0.0	0	0.0	0	0.0	0	0.0
Total	10,995	100.0	9,821	100.0	700	100.0	474	100.0
	Percentage of Total Businesses:			89.3		6.4		4.3

*NA-Tracts without household or family income as applicable

Assessment Area Demographics

Braxton, WV NonMSA								
<i>(2014 FFIEC Census Data and 2014 D&B Information)</i>								
Income Categories*	Tract Distribution		Families by Tract		Families < Poverty as a % of Families by Tract		Families by Family Income	
	#	%	#	%	#	%	#	%
Low	0	0.0	0	0.0	0	0.0	9,300	22.0
Moderate	6	13.3	4,149	9.8	1,112	26.8	7,150	16.9
Middle	31	68.9	31,029	73.6	5,003	16.1	8,444	20.0
Upper	8	17.8	7,008	16.6	456	6.5	17,292	41.1
NA	0	0.0	0	0.0	0	0.0		
Total	45	100.0	42,186	100.0	6,571	15.6	42,186	100.0
	Owner Occupied Units by Tract		Households					
			HHs by Tract		HHs < Poverty by Tract		HHs by HH Income	
	#	%	#	%	#	%	#	%
Low	0	0.0	0	0.0	0	0.0	14,733	24.0
Moderate	4,300	9.2	6,574	10.7	2,006	30.5	10,060	16.4
Middle	34,430	74.0	45,023	73.3	8,665	19.2	9,527	15.5
Upper	7,812	16.8	9,791	16.0	951	9.7	27,068	44.1
NA	0	0.0	0	0.0	0	0.0		
Total	46,542	100.0	61,388	100.0	11,622	18.9	61,388	100.0
	Total Businesses by Tract		Businesses by Tract and 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	791	14.2	683	13.8	80	19.8	28	13.0
Middle	3,654	65.5	3,261	65.7	232	57.4	161	74.5
Upper	1,136	20.3	1,017	20.5	92	22.8	27	12.5
NA	0	0.0	0	0.0	0	0.0	0	0.0
Total	5,581	100.0	4,961	100.0	404	100.0	216	100.0
Percentage of Total Businesses:				88.9		7.2		3.9

*NA-Tracts without household or family income as applicable

According to 2013 and 2014 data published by the FFIEC, many of the middle-income census tracts within the assessment area have been designated as being either distressed because of high poverty rates, or have been designated as being underserved. The following table provides the number of distressed or underserved middle-income tracts, by county, within the assessment area.

County	Number of Designated Tracts
Braxton	3 (2013 & 2014)
Fayette	8 (2013 only)
Gilmer	1 (2013), 1 (2014)
Harrison	12 (2014 only)
Nicholas	6 (2013 & 2014)
Richie	3 (2013 & 2014)
Webster	2 (2013 & 2014)
Totals	23 (2013), 27 (2014)

The Braxton, WV NonMSA assessment area is considered rural, and many of its residents commute to surrounding areas for employment. Like other regions of West Virginia the local economy is dependent upon coal mining, natural gas, timber, construction, tourism, and manufacturing jobs. Major area employers include local boards of education and area hospitals, Central WV Aging Services, United States Department of Justice, Glenville State College, Waco Oil and Gas Company, Alex Energy, Simonton Building Products, and Brooks Run Mining Company. Unemployment rates for September of each year since 2013 for all counties within this assessment area, as well as, the State of West Virginia are provided below; because Fayette and Raleigh Counties, WV were both part of this assessment area during 2013 they are included as well:

Geographic Area	Sept-13	Sept-14	Sept-15
Braxton County, WV	8.1%	7.2%	7.9%
Fayette County, WV	7.5%	7.1%	7.5%
Gilmer County, WV	5.5%	6.1%	6.8%
Harrison County, WV	5.1%	4.7%	6.2%
Lewis County, WV	5.5%	5.6%	7.5%
Nicholas County, WV	8.6%	7.7%	8.5%
Raleigh County, WV	6.5%	6.4%	6.8%
Ritchie County, WV	5.1%	5.1%	5.9%
Webster County, WV	9.1%	7.1%	7.0%
State of West Virginia	6.1%	5.8%	6.3%

A local economic development official stated that the area has been experiencing economic change. As the mining industry has contracted in the area, there has been a shift of focus to entrepreneurs and startup businesses. The economic development organization has been working to educate local businesses and banks in order to further the understanding that diversification and adaptation in changing industries will benefit the overall local community. In addition, the contact noted the long term effects of West Virginia University-Beckley becoming home to West Virginia University Tech having a most important impact on the local community. The contact expressed that local community banks are serving community banking and financing needs.

Considering the rural composition of the community, the discussion with a community development official, and a review of the performance evaluations of other financial institutions having a local presence, opportunities for community development activity within this particular market are somewhat limited. The bank, however, faces no constraints relative to its size and business strategy regarding available opportunities.

CONCLUSIONS WITH RESPECT TO PERFORMANCE TESTS IN THE BRAXTON, WV NONMSA ASSESSMENT AREA

LENDING TEST

The institution's overall lending performance within this assessment area is considered good. This conclusion is based on the evaluation of the bank's lending activity, the geographic and borrower lending distribution, and the level of community development lending, while taking into account the bank's market strategy, area demographic data, and aggregate CRA small business and HMDA loan data. Overall 2013 lending (HMDA and small business), as well as, small business lending (by product) had greater dollar volume than in 2014 and was afforded extra weight in reaching performance conclusions.

Lending Activity:

Bank lending activity based on loan volume by number (12.2%) within this assessment area exceeded both the bank's percentage of branch offices (9.5%) and the percentage of deposits (6.7%) in the area, and overall is considered excellent.

As of June 2014, UBI ranked third out of 20 institutions in local deposit market share having 11% of the assessment area's available FDIC insured deposits (credit union deposits are not included). According to 2014 market share data, the institution ranked seventh out of 123 reporters in reported mortgage lending with a 5.9% market share and ranked ninth out of 43 reporters in reported small business loans with a 4.8% market share. Both market share rankings consider originated and purchased loans.

Geographic Distribution:

As mentioned previously, there are no low-income census tracts in this assessment area. Within the market, the geographic distribution of lending is considered excellent for HMDA and good for small business lending. Overall, the bank's performance is considered good. In reaching this conclusion, slightly greater weight is afforded to small business lending due to a marginally larger dollar volume of lending over the two-year period.

Distribution of HMDA Loans by Income Level of Census Tract

Braxton, WV NonMSA (2014)								
Income Categories	Bank				Aggregate			
	#	%	\$(000s)	%\$	#	%	\$(000s)	%\$
	(31) Home Purchase				(1,126)			
Low	NA	NA	NA	NA	NA	NA	NA	NA
Moderate	3	9.7	241	5.3	88	7.8	9,267	6.0
Middle	22	71.0	2,893	64.2	691	61.4	79,513	51.9
Upper	6	19.3	1,375	30.5	346	30.8	64,418	42.1
	(22) Refinance				(708)			
Low	NA	NA	NA	NA	NA	NA	NA	NA
Moderate	8	36.4	517	26.5	50	7.1	4,775	5.4
Middle	13	59.1	1,120	57.4	487	68.8	54,496	61.7
Upper	1	4.5	315	16.1	171	24.1	29,070	32.9
	(70) Home Improvement				(263)			
Low	NA	NA	NA	NA	NA	NA	NA	NA
Moderate	12	17.1	143	11.1	27	10.3	695	7.3
Middle	51	72.9	718	55.5	181	68.8	5,895	61.9
Upper	7	10.0	433	33.4	55	20.9	2,930	30.8
	(1) Multi-Family				(10)			
Low	NA	NA	NA	NA	NA	NA	NA	NA
Moderate	0	0.0	0	0.0	4	40.0	1,492	30.4
Middle	0	0.0	0	0.0	5	50.0	2,944	59.9
Upper	1	100.0	475	100.0	1	10.0	475	9.7
	HMDA Totals							
Low	NA	NA	NA	NA	NA	NA	NA	NA
Moderate	23	18.5	901	10.9	169	8.0	16,229	6.3
Middle	86	69.4	4,731	57.5	1,364	64.8	142,848	55.8
Upper	15	12.1	2,598	31.6	573	27.2	96,893	37.9
NA*	NA	NA	NA	NA	NA	NA	NA	NA
Total	124	100.0	8,230	100.0	2,106	100.0	255,970	100.0

NA*-Tracts without household or family income as applicable

Within this market, home improvement loans were the most frequently extended HMDA product by UBI. Home purchase loans were more frequently reported by aggregate lenders during 2014. UBI's performance for home purchase, refinance, and home improvement loan types is considered excellent compared to aggregate data.

As reflected in the preceding table, overall, UBI's level of HMDA lending in moderate-income tracts is considered excellent, as its percentage of loans in such tracts was substantially greater than the 2014 aggregate lending level (8%) and the percentage of owner-occupied housing units located in moderate-income tracts (9.2%) within the market. The bank's 2013 performance is similar and also considered excellent.

Distribution of Small Business Loans by Income Level of Census Tract

Braxton, WV NonMSA (2014)								
Income Categories	Bank				Aggregate			
	#	%	\$(000s)	%\$	#	%	\$(000s)	%\$
Low	NA	NA	NA	NA	NA	NA	NA	NA
Moderate	31	37.8	5,453	31.5	231	14.2	16,201	19.2
Middle	42	51.2	8,474	48.9	987	60.8	51,149	60.6
Upper	9	11.0	3,394	19.6	406	25.0	17,030	20.2
NA*	NA	NA	NA	NA	NA	NA	NA	NA
Total	82	100.0	17,321	100.0	1,624	100.0	84,380	100.0

*NA-Tracts without household or family income as applicable
Loans where the geographic location is unknown are excluded from this table.

D&B data from 2014 indicates that 14.2% of all area businesses are located in moderate-income census tracts. In 2014, bank lending to businesses in those tracts was substantially greater than both the D&B business data and the 2014 aggregate lending demand proxies. This performance is considered excellent.

During 2013, the bank reported 173 small business loans totaling \$27.3 million within the assessment area. Of these loans 20 (11.6%) totaling \$2.7 million were made in moderate-income tracts. D&B data from 2013 indicates that 13.9% of all area businesses are located in moderate-income census tracts. In 2013, bank lending to businesses in those tracts was slightly below the percentage of businesses in moderate-income tracts but was very similar to the 2013 aggregate lending level (11.2%). This performance level is considered good.

The overall small business geographic distribution lending performance is considered good. In reaching this conclusion, more weight was given to the 2013 lending because of the greater dollar volume of small business lending.

Distribution by Borrower Income and Revenue Size of the Business:

Within the market, the distribution by borrower income or revenue is considered adequate for HMDA and excellent for small business lending. Overall, the bank’s performance is considered good. In reaching this conclusion, slightly greater weight was given to small business lending due to a larger dollar volume of lending.

Distribution of HMDA Loans by Income Level of Borrower

Braxton, WV NonMSA (2014)								
Income Categories	Bank				Aggregate			
	#	%	\$(000s)	%\$	#	%	\$(000s)	%\$
HMDA Totals								
Low	7	6.1	208	2.9	111	6.0	4,463	2.0
Moderate	28	24.6	487	6.7	260	14.0	15,126	6.9
Middle	19	16.7	563	7.7	425	22.9	37,643	17.3
Upper	60	52.6	6,025	82.7	1,061	57.1	160,861	73.8
Total	114	100.0	7,283	100.0	1,857	100.0	218,093	100.0
Unknown	10		947		252		38,173	

Percentages (%) are calculated on all loans where incomes are known

Within the assessment area, demographic data indicates that 22% and 16.9% of families are low- and moderate-income, respectively. UBI's lending to low-income borrowers was less than the percentage of low-income families in the market but similar to the 2014 aggregate lending level for low-income borrowers. UBI's lending to moderate-income borrowers was greater than the percentage of moderate-income families within the market and the 2014 aggregate lending level. Overall, this level of lending is considered excellent.

During 2013, within its assessment area, the bank extended 303 HMDA loans totaling \$30 million, where borrower income was known. Demographic data indicate that 22% and 16.6% of families were low- and moderate-income, respectively. UBI's lending to low-income borrowers (3.3%) was less than the percentage of low-income families in the market and the 2013 aggregate lending level (5%) for low-income borrowers. UBI's lending to moderate-income borrowers (10.9%) was less than the percentage of moderate-income families within the market and the 2013 aggregate lending level (13%). Overall, this level of lending is considered adequate.

The overall HMDA distribution by borrower income within this assessment area is considered adequate given the institution's size, branch locations, and the effective demand for credit. In reaching this conclusion, greater weight was given to the performance of the bank's 2013 HMDA lending, which was considered adequate, and had substantially greater dollar volume when compared to 2014 dollar volume.

Distribution of Lending by Loan Amount and Size of Business

Braxton, WV NonMSA (2014)								
by Revenue	Bank				Aggregate*			
	#	%	\$(000s)	% \$	#	%	\$(000s)	% \$
\$1 Million or Less	43	52.4	5,557	32.1	602	34.3	28,502	32.5
Over \$1 Million	35	42.7	11,148	64.4	NA	NA	NA	NA
Unknown	4	4.9	616	3.5	NA	NA	NA	NA
by Loan Size	Bank				Aggregate*			
\$100,000 or less	45	54.9	1,984	11.5	1,568	89.4	23,435	26.7
\$100,001-\$250,000	16	19.5	3,066	17.7	101	5.8	17,932	20.4
\$250,001-\$1 Million	21	25.6	12,271	70.8	85	4.8	46,346	52.9
Total	82	100.0	17,321	100.0	1,754	100.0	87,713	100.0

* No data is available for Aggregate loans with Revenues over \$1 million and those with Unknown revenues

According to aggregate small business data, 34.3% of all loans reported in 2014 were to businesses with annual revenues of \$1 million or less. Because the aggregate data includes significant lending by credit card lenders, data for traditional bank reporters was also considered as performance context. Excluding credit card lenders, 43.4% of small business loans reported in 2014 were to businesses having revenues of \$1 million or less. D&B data indicates that 88.9% of all local businesses have revenues that do not exceed \$1 million per year. In 2014, 52.4% of UBI's small business loans were to businesses with revenues less than \$1 million. This level of lending is considered excellent, and performance in 2013 was similar.

Community Development Lending:

As previously discussed, opportunities for community development lending are somewhat limited within the assessment area. However, when considering the bank's capacity, market position, and business strategy, the bank faces no constraints in extending community development loans within the assessment area. During the review period, the bank extended ten community development loans for a total of \$701,279. The proceeds from this relatively high level of lending were used for a variety of purposes, including economic revitalization, affordable housing, and the provision of services for low- and moderate-income residents. During 2013, within this assessment area 23 middle-income census tracts were designated as underserved or distressed areas and 27 tracts during 2014.

INVESTMENT TEST

The institution's investment with the United Venture Fund benefits businesses located throughout the West Virginia statewide area, including this assessment area. Also, a portion of both the \$2.5 million investment in the CRA Fund and portion of the \$1,000 investment in CAHEC benefits the Braxton Counties assessment area. Specifically, \$68,000 of the CRA Fund benefits the Braxton, WV NonMSA assessment area and \$210 of the CAHEC investment benefits Harrison County. In addition, the bank maintains a \$1 million investment in Qualified Zone Academy Bonds that also benefits Harrison County. UBI also holds a qualified Ginnie Mae investment, and a portion of the investment (\$58,000) has been designated to benefit this assessment area; the instrument provides affordable housing to residents. Charitable donations of \$51,084 have also been made that are considered qualified community development investments. These donations support organizations whose operations primarily benefit low- and moderate-income people and/or areas or provide for economic development. When considering investment opportunities and market presence, UBI's level of investments is considered adequate.

SERVICE TEST

Within the NonMSA assessment area, UBI's performance under the service test is considered outstanding. Systems for delivering retail banking services are readily accessible to all portions of the assessment area, including low- and moderate-income areas. Also, UBI is a leader in the provision of community development service endeavors within the assessment area.

Retail Services:

Delivery systems are accessible to all portions of the assessment area. ATMs are available and, through a network, provide customers with 24-hour nationwide access. Bank-by-mail and bank-by-computer services are also offered by the institution. In addition, the institution provides customers with 24-hour telephone access to their accounts through an automated system.

The institution has six offices within this assessment area. One of these branch offices (16.7%) is located in a moderate-income census tract. The distribution of branches is excellent given that 9.8% of the assessment area's families reside in moderate-income areas. As previously mentioned, there are no low-income geographies within the assessment area. Branch locations and business hours are considered convenient and meet the needs of the assessment area. No branch office was opened or closed since the previous evaluation.

Community Development Services:

The bank's level of participation in community development service endeavors within the assessment area is considered excellent. These activities include but are not limited to the following:

- A bank officer is an active team member of an initiative through the FHLBP that encourages revitalization and leadership for creating sustainable communities and affordable housing within the assessment area.
- Echoweb – A bank employee serves as a board member of this organization that provides affordable housing to low- and moderate-income residents of the area.
- Mountain Cap of West Virginia – An employee serves on the board of directors for this organization whose purpose is to provide services to low-income residents of the area.

- Summersville Area Chamber of Commerce – A bank officer is a board member and an active fundraising member of this organization that promotes industrial and economic development within the market it serves which includes distressed census tracts.
- Gilmer County Economic Development Association – An employee serves this organization as an active board member. This organization promotes economic and revitalization development, investment, and job creation in the county.
- Habitat for Humanity of Nicholas and Webster Counties – An employee is a board member of this organization that provides affordable housing for low- and moderate-income families.
- Lewis County Economic Development Authority – One employee serves as a member of this organization which focuses on job creation and micro-enterprise development within Lewis County.
- Webster County Economic Development Authority – One employee serves as a member of the board of directors of this organization.
- Webster County Housing Authority – An employee serves as co-chairman of this organization that provides affordable housing for low-income people.
- Webster Springs Main Street – An employee serves this organization as a board member. The organization promotes economic and revitalization development, investment, and job creation in downtown.
- Cowen and Webster Springs Volunteer Fire Departments – Bank employees serve in various capacities, such as chairman of the board and fund raising activities with these emergency non-profit organizations who serve residents of distressed and underserved census tracts.

NONMETROPOLITAN STATEWIDE AREA

(If none of the assessment areas within the non-metropolitan statewide area were reviewed using full-scope review)

DESCRIPTION OF INSTITUTION’S OPERATIONS IN NONMETROPOLITAN AREAS OF WEST VIRGINIA

UBI’s Jackson, WV NonMSA assessment area was reviewed using the limited review examination procedures. Information detailing the composition of the assessment area is included in **APPENDIX E** of this report. Information about loan volume, branches, and deposits is included in **APPENDIX D** of this report.

CONCLUSIONS WITH RESPECT TO PERFORMANCE TESTS IN NONMETROPOLITAN AREAS OF WEST VIRGINIA

The following table indicates for each test whether performance in an assessment area was generally below, consistent with, or exceeded performance within the State of West Virginia overall. Facts and data reviewed, including performance and demographic information, can be found in **APPENDIX C** of this report. Conclusions regarding performance, which did not impact the overall West Virginia State rating, are as follows:

Assessment Area	Lending Test	Investment Test	Service Test
Jackson, WV NonMSA	Consistent	Consistent	Below

COMMONWEALTH OF PENNSYLVANIA

CRA RATING FOR PENNSYLVANIA⁴: Satisfactory
The lending test is rated: High Satisfactory
The investment test is rated: Low Satisfactory
The service test is rated: High Satisfactory

Major factors supporting the rating include:

- Lending activity is consistent with capacity, and the bank offers a broad spectrum of loan products in an effort to meet local credit needs.
- Overall, and for each product reviewed, the geographic distribution of loans is considered adequate; while the distribution by borrower income and business revenue is considered good.
- The bank was a leader in making community development loans.
- Investment activity within the assessment area is considered adequate.
- Delivery systems and branch locations are accessible to all segments of the assessment areas.
- The bank and its employees participate in a relatively high level of community development activities.

SCOPE OF EXAMINATION

Reported HMDA and small business loans from calendar year 2013 and 2014 were analyzed to determine the geographic and the borrower distribution of the bank's lending. Farm lending was not included because of limited volume. The institution's efforts to serve its market through qualified community development loans, investments, and services were also reviewed.

The bank has delineated one assessment area, a portion of the Pittsburgh, PA MSA, in the Commonwealth of Pennsylvania. This assessment area accounts for 9%, 6.4%, and 8.2% of the institution's overall lending, branches, and deposit volume, respectively. Statewide ratings for Pennsylvania are based solely on the bank's performance in this assessment area.

DESCRIPTION OF INSTITUTION'S OPERATIONS IN PITTSBURGH, PA MSA ASSESSMENT AREA

The bank's assessment area is located in southwestern Pennsylvania and includes all of Fayette County. According to census data, the assessment area has a population of 136,606 and a median housing value of \$82,494. The owner-occupancy rate for the market (63.6%) is comparable to the rates for the entire MSA (63.7%) and the Commonwealth of Pennsylvania (63.4%). Within the assessment area, 15.6% of families are considered below the poverty level, which is significantly higher than the percentage for the MSA (8.2%) and the Commonwealth of Pennsylvania (8.5%). The 2013 and 2014 HUD estimated median family income for the Pittsburgh, PA MSA equals \$65,100 and 65,600, respectively. The bank operates four branch offices in this assessment area, and as of June 2014, ranked third out of ten institutions in local deposit market share with 16.7% of FDIC insured deposits within Fayette County.

⁴ For 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.

The following table includes pertinent demographic data for the assessment area.

Assessment Area Demographics

Pittsburgh, PA MSA (2014 FFIEC Census Data and 2014 D&B Information)								
Income Categories*	Tract Distribution		Families by Tract		Families < Poverty as a % of Families by Tract		Families by Family Income	
	#	%	#	%	#	%	#	%
Low	1	2.8	1,014	2.7	270	26.6	13,044	35.2
Moderate	28	77.8	28,866	77.9	4,771	16.5	7,647	20.6
Middle	6	16.7	5,851	15.8	575	9.8	8,111	21.9
Upper	1	2.7	1,326	3.6	147	11.1	8,255	22.3
NA	0	0.0	0	0.0	0	0.0		
Total	36	100.0	37,057	100.0	5,763	15.6	37,057	100.0
	Owner Occupied Units by Tract		Households					
			HHs by Tract		HHs < Poverty by Tract		HHs by HH Income	
	#	%	#	%	#	%	#	%
Low	764	1.9	1,742	3.1	475	27.3	19,375	35.0
Moderate	31,342	77.6	43,262	78.1	8,117	18.8	10,361	18.7
Middle	6,770	16.8	8,460	15.3	1,116	13.2	9,591	17.3
Upper	1,539	3.7	1,899	3.5	265	14.0	16,036	29.0
NA	0	0.0	0	0.0	0	0.0		
Total	40,415	100.0	55,363	100.0	9,973	18.0	55,363	100.0
	Total Businesses by Tract		Businesses by Tract and Revenue Size					
			Less than or = \$1 Million		Over \$1 Million		Revenue not Reported	
	#	%	#	%	#	%	#	%
Low	234	4.3	216	4.4	7	2.4	11	4.3
Moderate	4,168	76.5	3,731	76.1	236	81.7	201	78.2
Middle	756	13.9	700	14.3	24	8.3	32	12.5
Upper	293	5.3	258	5.2	22	7.6	13	5.0
NA	0	0.0	0	0.0	0	0.0	0	0.0
Total	5,451	100.0	4,905	100.0	289	100.0	257	100.0
	Percentage of Total Businesses:			90.0		5.3		4.7

*NA-Tracts without household or family income as applicable

The local economy depends on healthcare, natural gas, retail, service, and agricultural industries. Major area employers include state and local government, local education system, The Uniontown Hospital, Nemaquin Woodlands, Teletch Services, and Walmart. September unemployment rates for each year since 2013 are included in the following table:

Geographic Area	Sept-13	Sept-14	Sept-15
Fayette County, PA	8.4%	6.1%	6.5%
Pittsburg, PA MSA	6.3%	4.9%	4.9%
Commonwealth of Pennsylvania	6.9%	5.1%	4.9%

As reflected in the table, the September unemployment rate in Fayette County has fluctuated over the three-year period, but remains high in comparison to the unemployment rates for the entire Pittsburgh, PA MSA and the Commonwealth. An individual knowledgeable of the local market area was contacted during the evaluation to discuss local economic conditions and community credit needs. The contact noted that while the broader local area depends on the oil and gas industry for jobs, community leaders have recently organized an effort to support lending and capital sources for the creation of sustainable local jobs for county residents. The official indicated these local jobs could cut down on the number of residents who commute daily for employment opportunities. The contact indicated that local financial institutions are adequately serving the needs of the local market.

Though located within an MSA, the bank’s delineated assessment area within the market is somewhat rural, and based on the discussion with a community development official and a review of the performance evaluations of other financial institutions having a local presence, opportunities for community development activity within this particular market are somewhat limited. The bank, however, faces no constraints relative to its size and business strategy regarding available opportunities.

CONCLUSIONS WITH REPECT TO PERFORMANCE TESTS IN THE PITTSBURGH, PA MSA ASSESSMENT AREA

LENDING TEST

The institution's overall lending performance within this assessment area is rated high satisfactory. This conclusion is based on the evaluation of geographic and borrower distribution, as well as, the excellent level of community development lending while taking into account the bank’s market strategy, area demographic data, and aggregate CRA small business and HMDA loan data.

Lending Activity:

The volume of lending by number (9%) exceeds the percentage of bank offices (6.4%) in the assessment area and the proportion of bank deposits (8.2%); however, the dollar volume of lending (6.2%) within the area is less than the percentage of offices and deposits. Overall, this level of lending activity is considered adequate. Within this assessment area during 2014, the bank ranked fifth out of 170 reporters in HMDA lending holding 4.6% of market share, and ranked third out of 43 reporters in small business reporters holding 7.4% of the market that in the case of both product categories includes all originations and purchases.

Geographic Distribution:

The assessment area contains one low-income census tract and 28 moderate-income census tracts. The geographic distribution of HMDA loans is considered good, while the geographic distribution for small business loans is adequate. Overall, the distribution is considered adequate given the much greater dollar volume of small business loans.

Distribution of HMDA Loans by Income Level of Census Tract

Pittsburgh, PA MSA (2014)								
Income Categories	Bank				Aggregate			
	#	%	\$(000s)	% \$	#	%	\$(000s)	% \$
	(48) Home Purchase				(1,099)			
Low	1	2.1	124	2.0	22	2.0	1,773	1.4
Moderate	33	68.8	2,924	48.2	826	75.2	88,100	69.9
Middle	6	12.5	984	16.2	187	17.0	24,485	19.4
Upper	8	16.6	2,038	33.6	64	5.8	11,738	9.3
	(21) Refinance				(724)			
Low	0	0.0	0	0.0	16	2.2	1,057	1.4
Moderate	12	57.1	861	40.7	534	73.8	50,715	68.9
Middle	8	38.1	1,126	53.2	138	19.1	15,320	20.8
Upper	1	4.8	131	6.1	36	4.9	6,496	8.9
	(41) Home Improvement				(587)			
Low	1	2.4	3	0.2	13	2.2	408	1.8
Moderate	28	68.3	1,137	83.1	440	75.0	16,440	72.1
Middle	8	19.5	89	6.5	114	19.4	5,304	23.3
Upper	4	9.8	140	10.2	20	3.4	658	2.8
	(1) Multi-Family				(7)			
Low	0	0.0	0	0.0	1	14.3	121	10.0
Moderate	0	0.0	0	0.0	4	57.1	222	18.3
Middle	1	100.0	75	100.0	2	28.6	867	71.7
Upper	0	0.0	0	0.0	0	0.0	0	0.0
	HMDA Totals							
Low	2	1.8	127	1.3	52	2.2	3,359	1.5
Moderate	73	65.8	4,922	51.1	1,804	74.6	155,477	69.5
Middle	23	20.7	2,274	23.6	441	18.2	45,976	20.6
Upper	13	11.7	2,309	24.0	120	5.0	18,892	8.4
NA*	NA	NA	NA	NA	NA	NA	NA	NA
Total	111	100.0	9,632	100.0	2,417	100.0	223,704	100.0

NA*-Tracts without household or family income as applicable

As reflected in the preceding table, though the bank originated more home purchase loans during 2014 than refinance loans, it also originated comparable volumes of home improvement loans. UBI's home purchase and home improvement lending are considered good, while refinance lending is considered adequate. According to census data, 1.9% of owner-occupied housing units are located in low-income tracts, while the percentage of owner-occupied housing units within moderate-income tracts is 77.6%. On a combined product basis, the bank's lending in low-and-moderate-income tracts is slightly lower than the demographic demand proxy and the aggregate lending levels, but is nonetheless considered good.

During 2013, the bank originated 131 HMDA loans totaling \$9.6 million in this assessment area. Of these loans, none were extended in the single low-income tract compared to 1.7% extended by aggregate reporters, while 96 (73.3%) were extended in moderate-income tracts compared to 73.8% extended by the aggregate. Though the bank did not originate a HMDA loan located in the low-income tract, its penetration was considered good within moderate-income tracts during 2013. On a combined product basis, although the bank did not extend a HMDA loan in the single low-income tract, lending in moderate-income tracts is similar to the demographic and aggregate demand proxies, and given the significantly greater apparent loan demand within moderate-income tracts, overall, UBI's distribution by census tract is considered good.

Overall, given similar yearly dollar volume, UBI’s geographic distribution of HMDA loans is considered good.

Distribution of Small Business Loans by Income Level of Census Tract

Pittsburgh, PA MSA (2014)								
Income Categories	Bank				Aggregate			
	#	%	\$(000s)	% \$	#	%	\$(000s)	% \$
Low	2	1.4	160	0.8	81	4.2	7,657	7.0
Moderate	90	63.4	13,168	67.2	1,432	74.5	78,252	71.8
Middle	25	17.6	3,292	16.8	299	15.6	14,940	13.7
Upper	25	17.6	2,974	15.2	109	5.7	8,205	7.5
NA*	NA	NA	NA	NA	NA	NA	NA	NA
Total	142	100.0	19,594	100.0	1,921	100.0	109,054	100.0

*NA-Tracts without household or family income as applicable
Loans where the geographic location is unknown are excluded from this table.

D&B data from 2014 indicates that 4.3% and 76.5% of all area businesses are located in low- and moderate-income census tracts, respectively. The bank only originated two loans (1.4%) in low-income tracts but it’s lending in moderate-income areas (63.4%), where there is greater effective loan demand, is closer to the aggregate lending level and is considered good. Overall, the bank’s small business lending in low- and moderate-income tracts is considered adequate and its 2013 lending level was similar.

Distribution by Borrower Income and Revenue Size of the Business:

The overall distribution by borrower income and business revenue within this assessment area is considered good given the bank’s size, branch locations, and the effective demand for credit.

Distribution of HMDA Loans by Income Level of Borrower

Pittsburgh, PA MSA (2014)								
Income Categories	Bank				Aggregate			
	#	%	\$(000s)	% \$	#	%	\$(000s)	% \$
HMDA Totals								
Low	16	17.0	1,028	12.7	290	13.5	15,051	7.8
Moderate	23	24.5	1,459	18.0	577	26.8	40,010	20.9
Middle	22	23.4	1,441	17.7	618	28.7	51,796	27.0
Upper	33	35.1	4,196	51.6	670	31.0	85,030	44.3
Total	94	100.0	8,124	100.0	2,155	100.0	191,887	100.0
Unknown	17		1,508		262		31,817	

Percentages (%) are calculated on all loans where incomes are known

Demographic data indicates that within the assessment area, 35.2% and 20.6% of families are low- and moderate-income, respectively. UBI’s lending to low-income borrowers (17%) was less than the demographic proxy; however, lending to moderate-income borrowers (24.5%) was higher than the proxy. When considering demographic demand proxies and the aggregate lending levels in low- and moderate-income tracts, UBI’s overall level of lending is considered good, and, its 2013 lending level was similar and is also considered good.

Distribution of Lending by Loan Amount and Size of Business

Pittsburgh, PA MSA (2014)								
by Revenue	Bank				Aggregate*			
	#	%	\$(000s)	% \$	#	%	\$(000s)	% \$
\$1 Million or Less	92	64.8	9,317	47.6	903	46.0	40,861	37.3
Over \$1 Million	46	32.4	10,151	51.8	NA	NA	NA	NA
Unknown	4	2.8	126	0.6	NA	NA	NA	NA
by Loan Size	Bank				Aggregate*			
\$100,000 or less	95	66.9	3,566	18.2	1,762	89.8	43,133	39.4
\$100,001-\$250,000	27	19.0	4,929	25.2	111	5.7	19,519	17.8
\$250,001-\$1 Million	20	14.1	11,099	56.6	89	4.5	46,793	42.8
Total	142	100.0	19,594	100.0	1,962	100.0	109,445	100.0

* No data is available for Aggregate loans with Revenues over \$1 million and those with Unknown revenues

D&B data indicates that 90% of all local businesses have revenues that do not exceed \$1 million per year. In 2014, 46% of aggregate reported small business loans were to businesses with annual revenues of \$1 million or less. The remaining loans were to businesses that either had revenues exceeding \$1 million or revenues were unknown. Excluding credit card lenders, 56.9% of reported small business loans were to businesses having revenues of \$1 million or less. With 64.8% of its 2014 small business loans made to businesses with annual revenues of \$1 million or less, the bank's level of lending is considered good. The performance for 2013 is substantially similar and is also considered good.

Community Development Lending:

As previously discussed, opportunities for community development lending are somewhat limited within the Pittsburgh, PA MSA assessment area. When considering the bank's capacity, market position, and business strategy, the bank faces no constraints in extending community development loans within the assessment area. During the evaluation period the bank was a leader in extending community development loans. Sixty-seven community development loans totaling approximately \$16 million within the assessment area were made during the period. The loans provided funding for organizations whose primary purpose was either affordable housing or the provision of services to low- and moderate-income individuals.

INVESTMENT TEST

UBI holds qualified community development bond investments that either directly benefit Fayette County or more broadly the Commonwealth of Pennsylvania totaling \$1.1 million. Specifically, UBI holds a qualified Fannie Mae investment, and a portion of the investment (\$363,000) has been designated to benefit this assessment area; the instrument provides affordable housing to residents. UBI also holds a \$715,000 investment in a Pennsylvania Housing Finance Agency Single Family Mortgage Revenue Bond which helps to provide affordable housing in the Commonwealth, including the assessment area. Additionally, charitable donations totaling \$14,725 have been made that are considered qualified community development investments. These donations support organizations whose operations primarily benefit low- and moderate-income people and/or areas or provide for economic development. When considering investment opportunities and market presence, UBI's level of investments is considered adequate.

SERVICE TEST

Within the Pittsburgh, PA MSA, UBI's performance under the service test is rated high satisfactory. Systems for delivering retail banking services are accessible to essentially all portions of the assessment area, including low- and moderate-income areas. Also, UBI provides a relatively high level of services that include active participation in community development organizations.

Retail Services:

Delivery systems are accessible to all portions of the assessment area. ATMs are available and, through a network, provide customers with 24-hour nationwide access. Bank-by-mail and bank-by-computer services are also offered by the institution. In addition, the institution provides customers with 24-hour telephone access to their accounts through an automated system.

The institution has four branches within this assessment area, three of which (75%) are located in moderate-income census tracts. The distribution of branches is good when considering that 2.7% and 77.9% of the assessment area's families reside in low- and moderate-income areas, respectively. Branch locations and business hours are considered convenient and meet the needs of the assessment area. No branch offices have been opened or closed since the previous examination.

Community Development Services:

The level of participation by UBI and its employees in community development service activities is considered good. These activities include but are not limited to the following:

- Albert Gallatin Human Service Senior Center – A bank employee serves on the board of directors for this organization that provides social services for low- and moderate- income senior citizens in Fayette County.
- Fay Penn Economic Development Council – A bank officer serves on the board of directors of this organization which provides resources for small business development.
- Goodwill of Southwestern Pennsylvania – A bank officer serves as a board member of this organization that provides job training for low-income adults.
- Fayette County Career and Technical Institute – A bank officer serves as a board member of this organization that provides job training for high school students.
- Georges Creek Municipal Authority – A bank employee serves as a board member on the public service authority.
- First Baptist Church Backpack Feeding Program – A bank employee serves as a board member of this project which provides meals to low- and-moderate-income residents of the county.
- Confer Vista Apartment Advisory Board- A bank employee serves as a board member for this advisory board that oversees budgeting, planning, and policies for this HUD supported apartment complex.

CRA APPENDIX A
SCOPE OF EXAMINATION

LIST OF ASSESSMENT AREAS, TYPE OF EXAMINATION, AND BRANCHES VISITED		
Assessment Area	Type of Examination	Branches Visited
Wheeling, WV-OH MSA	Full-Scope	621 Seventh Street, Moundsville, WV 3198 Belmont St, Bellaire, OH
Charleston-Huntington-Ashland, WV-OH-KY CSA	Full-Scope	1200 Grosscup Avenue, Dunbar, WV
Beckley, WV MSA	Limited-Scope	None
Parkersburg-Marietta-Vienna, WV-OH MSA	Limited-Scope	None
Morgantown, WV MSA	Full- Scope	689 Fairmont Rd, Westover, WV
Weirton-Steubenville, WV-OH MSA	Limited- Scope	None
Washington-Baltimore-Northern Virginia, DC-MD-VA-WV CSA	Full-Scope	1219 Mount Aetna Rd, Hagerstown, MD 450 Foxcroft Ave, Martinsburg, WV
Braxton, WV NonMSA	Full-Scope	101 East Main St, Glenville, WV
Jackson NonMSA	Limited- Scope	None
Pittsburgh, PA MSA	Full-Scope	113 Penn Street, Point Marion, PA

CRA APPENDIX B

SUMMARY OF STATE AND MULTISTATE MSA RATINGS

State or Multistate Metropolitan Area Name	Lending Test Rating	Investment Test Rating	Service Test Rating	Overall State Rating
Wheeling, West Virginia-Ohio Multistate MSA	High Satisfactory	Low Satisfactory	High Satisfactory	Satisfactory
Washington-Baltimore-Northern Virginia, District of Columbia-Maryland-Virginia-West Virginia Multistate CSA	High Satisfactory	High Satisfactory	High Satisfactory	Satisfactory
State of West Virginia	High Satisfactory	Low Satisfactory	Outstanding	Satisfactory
Commonwealth of Pennsylvania	High Satisfactory	Low Satisfactory	High Satisfactory	Satisfactory

CRA APPENDIX C

LIMITED REVIEW TABLES

The limited review tables presented within this appendix provide lending information for the bank during 2014. The tables contain the number of bank loans and corresponding percentages of lending within low- and moderate-income census tracts as well as lending to low- and moderate-income borrowers and businesses of different revenues. Additionally, the tables also provide the corresponding 2014 aggregate lending levels within those tracts and to borrowers for HMDA and small business loans. While 2013 lending tables are not included, the data was analyzed and a statement is included with respect to its performance that is included below each limited review lending table.

The tables also detail the demographic demand proxies for HMDA and small business loans. For HMDA lending, the demographic proxy for lending in low- and moderate-income census tracts is the percentage of owner-occupied housing within those tracts, while the proxy for lending to low- and moderate-income borrowers is the percentage of area families that are low- and moderate-income. For small business lending, the proxies for lending in low- and moderate-income census tracts are the percentages of businesses located within these tracts. Additionally, the percentages of total businesses and farms with revenues less than \$1 million are used as proxies for the distributions of lending by size of business.

For each assessment area, community development lending and information considered when evaluating performance under the investment and service tests is also provided. The number of branches in low- and moderate-income tracts is specified; as well as the total number of branch locations.

Beckley, WV MSA

This market includes all of Fayette and Raleigh Counties, West Virginia. There are no low-income census tracts in the assessment area.

Performance Test Data for the Beckley, WV MSA Assessment Area

LENDING TEST

Limited Review Lending Table

Beckley, WV MSA (2014)								
Income Categories	Bank		Aggregate	Demographic	Bank		Aggregate	Demographic
	#	%	%	%	#	%	%	%
	Home Purchase				Home Improvement			
<i>Geographic</i>	(61)				(45)			
Low	NA	NA	NA	NA	NA	NA	NA	NA
Moderate	1	1.6	6.7	10.2	2	4.4	7.1	10.2
Middle	49	80.3	75.7	71.7	35	77.8	75.7	71.7
Upper	11	18.1	17.6	18.1	8	17.8	17.2	18.1
	Refinance				Multi-Family			
<i>Geographic</i>	(21)				(2)			
Low	NA	NA	NA	NA	NA	NA	NA	NA
Moderate	1	4.8	9.2	10.2	0	0.0	16.7	10.2
Middle	18	85.7	72.4	71.7	1	50.0	75.0	71.7
Upper	2	9.5	18.4	18.1	1	50.0	8.3	18.1
	HMDA Totals				Consumer			
<i>Geographic</i>	(129)				(NA)			
Low	NA	NA	NA	NA	NA	NA	NA	NA
Moderate	4	3.1	7.6	10.2	NA	NA	NA	NA
Middle	103	79.8	74.6	71.7	NA	NA	NA	NA
Upper	22	17.1	17.8	18.1	NA	NA	NA	NA
<i>Borrower</i>	(121)				(NA)			
Low	5	4.1	8.1	23.7	NA	NA	NA	NA
Moderate	16	13.2	17.5	16.7	NA	NA	NA	NA
Middle	25	20.7	22.6	19.3	NA	NA	NA	NA
Upper	75	62.0	51.8	40.3	NA	NA	NA	NA
	Small Business				Small Farm			
<i>Geographic</i>	(96)				(0)			
Low	NA	NA	NA	NA	NA	NA	NA	NA
Moderate	10	10.4	8.9	13.4	0	0.0	11.1	10.5
Middle	62	64.6	73.0	68.6	0	0.0	77.8	69.7
Upper	24	25.0	18.1	18.0	0	0.0	11.1	19.7
<i>Revenue</i>								
Busn/ Farms with revenues <=\$1 M	56	58.3	39.7	87.9	0	0.0	66.7	100.0

Geographic () represents the total number of bank loans for the specific Loan Purpose where geography is known

Borrower () represents the total number of bank loans for the specific Loan Purpose where income is known

NA represents no activity in the income category

Nine community development loans totaling \$1.2 million were extended within this assessment area. These loans were to organizations that provide affordable housing, and provide social services or economic development to low- and moderate-income residents and areas.

The bank's lending performance in 2014 is below the performance reflected in the State of West Virginia rating.

INVESTMENT TEST

Qualified investments that benefit statewide and regional areas have been made totaling \$854,000 through the United Venture Fund, and, an additional investment with the United Fund allocated to benefit this assessment area totaling \$6,000 is noted. Additionally, \$34,000 in the CRA Fund and \$305,000 in a Ginnie Mae investment have been allocated to this assessment area. Charitable donations totaling \$166,101 were also made in this market.

SERVICE TEST

UBI operates seven branch offices in this assessment area, of which one (14.3%) is located in a moderate-income census tract. No branch offices have been opened or closed since the previous evaluation. The bank offers services that are substantially the same as those available to the other communities the bank serves. Various bank officers and employees serve through fund raising, committee, and board involvement and in other financial capacities the Kids Classic Festival, a bank supported event that raises money that assists with emergency housing and social service activities throughout the year that helps low- and moderate-income families within the assessment area. Additionally, 19 bank employees served in various capacities such as board member, finance committee member for other similar organizations or have assisted with FHLB grant applications for 20 qualified community development organizations operating in this market.

Weirton-Steubenville, WV-OH MSA

This market includes all of Brooke and Hancock Counties, West Virginia, and Jefferson County, Ohio.

Performance Test Data for the Weirton-Steubenville, WV-OH MSA Assessment Area

LENDING TEST

Limited Review Lending Table

Weirton-Steubenville, WV-OH MSA (2014)								
Income Categories	Bank		Aggregate	Demographic	Bank		Aggregate	Demographic
	#	%	%	%	#	%	%	%
	Home Purchase				Home Improvement			
<i>Geographic</i>	(12)				(8)			
Low	0	0.0	0.1	0.7	0	0.0	0.3	0.7
Moderate	0	0.0	9.4	10.7	1	12.5	10.3	10.7
Middle	12	100.0	81.6	79.7	6	75.0	77.7	79.7
Upper	0	0.0	8.9	8.9	1	12.5	11.7	8.9
	Refinance				Multi-Family			
<i>Geographic</i>	(5)				(0)			
Low	0	0.0	0.4	0.7	0	0.0	0.0	0.7
Moderate	0	0.0	9.3	10.7	0	0.0	14.3	10.7
Middle	5	100.0	82.3	79.7	0	0.0	85.7	79.7
Upper	0	0.0	7.9	8.9	0	0.0	0.0	8.9
	HMDA Totals				Consumer			
<i>Geographic</i>	(25)				(NA)			
Low	0	0.0	0.2	0.7	NA	NA	NA	NA
Moderate	1	4.0	9.5	10.7	NA	NA	NA	NA
Middle	23	92.0	81.3	79.7	NA	NA	NA	NA
Upper	1	4.0	8.9	8.9	NA	NA	NA	NA
<i>Borrower</i>	(22)				(NA)			
Low	9	40.9	8.6	19.8	NA	NA	NA	NA
Moderate	6	27.3	18.5	18.6	NA	NA	NA	NA
Middle	3	13.6	27.9	21.2	NA	NA	NA	NA
Upper	4	18.2	45.0	40.4	NA	NA	NA	NA
	Small Business				Small Farm			
<i>Geographic</i>	(25)				(0)			
Low	1	4.0	8.5	6.3	0	0.0	0.0	0.0
Moderate	6	24.0	10.4	11.3	0	0.0	16.7	9.3
Middle	17	68.0	74.8	75.1	0	0.0	83.3	81.3
Upper	1	4.0	6.4	7.3	0	0.0	0.0	9.3
<i>Revenue</i>								
Busn/ Farms with revenues <=\$1 M	15	60.0	37.5	88.3	0	0.0	46.2	100.0

Geographic () represents the total number of bank loans for the specific Loan Purpose where geography is known

Borrower () represents the total number of bank loans for the specific Loan Purpose where income is known

NA represents no activity in the income category

The bank's lending performance in 2014 exceeds its 2013 performance. Two community development loans totaling \$4.5 million were extended within this assessment area. These loans were to organizations that provide social services or economic development to low- and moderate-income residents and areas.

INVESTMENT TEST

Qualified investments that benefit statewide and regional areas have been made totaling \$854,000 through the United Venture Fund, and \$17,000 of the bank's investment with the United Fund has been allocated to benefit this assessment area. Other qualified investments include a portion (\$121,000) of a Fannie Mae investment instrument that benefits this assessment area. Charitable donations totaling \$2,230 were also made in this market.

SERVICE TEST

The bank operates two branches in this assessment area, and one (50%) is located in a moderate-income census tract. No branch offices have been opened or closed since the previous evaluation. Banking services offered in this assessment area are substantially the same as the services available to other communities the bank serves. Two bank employees have provided financial expertise and/or served as a board member with area economic development organizations within the assessment area.

Parkersburg-Vienna, WV-OH MSA

The market includes all of Wood County, West Virginia. The assessment area contains no low-income census tracts.

Performance Test Data for the Parkersburg-Vienna, WV-OH MSA Assessment Area

LENDING TEST

Limited Review Lending Table

Parkersburg-Vienna, WV-OH MSA (2014)								
Income Categories	Bank		Aggregate	Demographic	Bank		Aggregate	Demographic
	#	%	%	%	#	%	%	%
	Home Purchase				Home Improvement			
<i>Geographic</i>	(94)				(25)			
Low	NA	NA	NA	NA	NA	NA	NA	NA
Moderate	19	20.2	12.5	12.5	3	12.0	12.7	12.5
Middle	53	56.4	68.4	72.8	14	56.0	61.1	72.8
Upper	22	23.4	19.1	14.7	8	32.0	26.2	14.7
	Refinance				Multi-Family			
<i>Geographic</i>	(13)				(2)			
Low	NA	NA	NA	NA	NA	NA	NA	NA
Moderate	2	15.4	10.6	12.5	1	50.0	27.3	12.5
Middle	7	53.8	71.7	72.8	1	50.0	63.6	72.8
Upper	4	30.8	17.7	14.7	0	0.0	9.1	14.7
	HMDA Totals				Consumer			
<i>Geographic</i>	(134)				(NA)			
Low	NA	NA	NA	NA	NA	NA	NA	NA
Moderate	25	18.7	12.0	12.5	NA	NA	NA	NA
Middle	75	56.0	68.8	72.8	NA	NA	NA	NA
Upper	34	25.3	19.2	14.7	NA	NA	NA	NA
<i>Borrower</i>	(127)				(NA)			
Low	16	12.6	11.6	20.6	NA	NA	NA	NA
Moderate	36	28.3	22.7	16.5	NA	NA	NA	NA
Middle	25	19.7	24.2	23.4	NA	NA	NA	NA
Upper	50	39.4	41.5	39.6	NA	NA	NA	NA
	Small Business				Small Farm			
<i>Geographic</i>	(181)				(0)			
Low	NA	NA	NA	NA	NA	NA	NA	NA
Moderate	81	44.8	25.3	24.3	0	0.0	0.0	5.7
Middle	84	46.4	64.2	63.3	0	0.0	100.0	90.8
Upper	16	8.8	10.5	12.4	0	0.0	0.0	3.4
<i>Revenue</i>								
Busn/ Farms with revenues <=\$1 M	71	39.2	35.7	89.7	0	0.0	100.0	100.0

Geographic () represents the total number of bank loans for the specific Loan Purpose where geography is known
Borrower () represents the total number of bank loans for the specific Loan Purpose where income is known
NA represents no activity in the income category

Performance in 2013 was not as good as in 2014 but was consistent with overall West Virginia state performance. Eight community development loans totaling \$1.3 million were extended within this assessment area. These loans were to organizations that provide affordable housing, and provide social services or economic development to low- and moderate-income residents and areas.

INVESTMENT TEST

Qualified investments that benefit statewide and regional areas have been made totaling \$854,000 through the United Venture Fund, and an additional portion of the investment with the CRA Fund allocated to benefit this assessment area totaling \$17,000. Qualified donations totaling \$108,157 were made in the assessment area during the review period.

SERVICE TEST

The bank has five branches in this market, two (40%) of which are located in a moderate-income area, and delivers substantially the same services as are available within its other assessment areas. No branch offices have been opened or closed since the previous evaluation. Within the assessment area, the bank and its employees contribute to several qualified community development services, particularly, Kid's Count Golf Classic for the Big Brother & Big Sister Club of Parkersburg. This event raises funds to benefit the club whose primary purpose is to provide services primarily benefiting children from low- and moderate-income families within the assessment area. Numerous bank employees participate on this coordinated specific fund raising event by serving on the board of directors committee, budget and source funds committee, and as event accountant. Furthermore, numerous bank officers and employees have served Children's Home Society of West Virginia, an orphanage and foster care placement organization. Involvement has included financial literacy programs, serving on the finance and board committees, and fundraising. Additionally, numerous employees serve six organizations as board members or by providing financial expertise whose primary responsibility is focused toward qualified community development services.

Jackson, WV NonMSA

This market includes all of Jackson County, West Virginia. There are no low- or moderate-income tracts within the assessment area.

Performance Test Data for the Jackson, WV NonMSA Assessment Area

LENDING TEST

Limited Review Lending Table

Jackson, WV NonMSA (2014)								
Income Categories	Bank		Aggregate	Demographic	Bank		Aggregate	Demographic
	#	%	%	%	#	%	%	%
	Home Purchase				Home Improvement			
<i>Geographic</i>	(9)				(26)			
Low	NA	NA	NA	NA	NA	NA	NA	NA
Moderate	NA	NA	NA	NA	NA	NA	NA	NA
Middle	7	77.8	85.9	89.5	22	84.6	87.6	89.5
Upper	2	22.2	14.1	10.5	4	15.4	12.4	10.5
	Refinance				Multi-Family			
<i>Geographic</i>	(8)				(0)			
Low	NA	NA	NA	NA	NA	NA	NA	NA
Moderate	NA	NA	NA	NA	NA	NA	NA	NA
Middle	5	62.5	83.4	89.5	0	0.0	0.0	89.5
Upper	3	37.5	16.6	10.5	0	0.0	0.0	10.5
	HMDA Totals				Consumer			
<i>Geographic</i>	(43)				(NA)			
Low	NA	NA	NA	NA	NA	NA	NA	NA
Moderate	NA	NA	NA	NA	NA	NA	NA	NA
Middle	34	79.1	85.5	89.5	NA	NA	NA	NA
Upper	9	20.9	14.5	10.5	NA	NA	NA	NA
<i>Borrower</i>	(43)				(NA)			
Low	1	2.3	4.3	17.9	NA	NA	NA	NA
Moderate	9	20.9	18.5	15.5	NA	NA	NA	NA
Middle	11	25.6	23.9	19.7	NA	NA	NA	NA
Upper	22	51.2	53.3	46.9	NA	NA	NA	NA
	Small Business				Small Farm			
<i>Geographic</i>	(40)				(0)			
Low	NA	NA	NA	NA	NA	NA	NA	NA
Moderate	NA	NA	NA	NA	NA	NA	NA	NA
Middle	37	92.5	90.5	91.6	0	0.0	100.0	91.1
Upper	3	7.5	9.5	8.4	0	0.0	0.0	8.9
<i>Revenue</i>								
Busn/ Farms with revenues <=\$1 M	32	80.0	50.4	86.3	0	0.0	100.0	100.0

Geographic () represents the total number of bank loans for the specific Loan Purpose where geography is known
Borrower () represents the total number of bank loans for the specific Loan Purpose where income is known
NA represents no activity in the income category

Overall, the bank's lending performance during 2014 is substantially similar to the performance during 2013. During the review period, two community development loans were extended totaling \$419,644.

INVESTMENT TEST

Qualified investments that benefit statewide and regional areas have been made totaling \$854,000 through the United Venture Fund, and \$517,000 of the bank's investment with the CRA Fund benefit this assessment area. Also, a public utilities municipal bond totaling \$75,000 is noted. Charitable donations totaling \$3,870 were made in this market.

SERVICE TEST

UBI operates two branch offices in this assessment area which deliver banking services which are substantially the same as the services available to the other communities the bank serves. No branch offices have been opened or closed since the previous evaluation. Three bank employees serve as board members or provide financial expertise to local economic development and social service organizations within the local market.

CRA APPENDIX D

BRANCH, LOAN, AND DEPOSIT VOLUME BY ASSESSMENT AREA

Assessment Area	Loans				Deposits		Branches	
	#	%	\$ (000s)	%	\$ (000s)	%	#	%
Multi State MSAs								
Washington-Baltimore-Northern Virginia, DC-MD-WV CSA	705	12.2%	\$123,494	13%	\$361,757	8.9%	9	14.3%
Wheeling, WV-OH MSA	357	6.2%	\$39,554	4.1%	\$391,947	9.6%	8	12.7%
West Virginia Assessment Areas								
Charleston-Huntington-Ashland, WV-OH-KY CSA	1,313	22.7%	\$231,265	24.3%	\$1,062,118	26.1%	13	20.6%
Morgantown, WV MSA	1,033	17.8%	\$267,957	28.1%	\$678,417	16.6%	7	11.1%
Parkersburg-Marietta-Vienna, WV-OH MSA	657	11.4%	\$87,036	9.1%	\$418,995	10.3%	5	7.9%
Steubenville-Weirton, OH-WV MSA	91	1.6%	\$6,478	.7%	\$69,389	1.7%	2	3.2%
Beckley, WV MSA	225	3.9%	\$29,285	3.1%	\$365,530	9%	7	11.1%
Braxton, WV NonMSA	709	12.2%	\$88,402	9.3%	\$274,697	6.7%	6	9.5%
Jackson, WV NonMSA	175	3%	\$19,660	2.1%	\$118,484	2.9%	2	3.2%
Total West Virginia Assessment Areas	4,203	72.6%	\$730,083	76.7%	\$2,987,630	73.3%	42	66.6%
Pennsylvania Assessment Area								
Pittsburgh, PA MSA	522	9%	\$58,903	6.2%	\$335,423	8.2%	4	6.4%
Total All Areas	5,787	100%	\$952,034	100%	\$4,076,757	100%	63	100%

CRA APPENDIX E
Assessment Area Composition

Multistate Metropolitan Assessment Areas			
AA Name	State	County	Tracts
Wheeling, WV-OH	WV	Marshall	All
	WV	Ohio	All
	OH	Belmont	All
Washington-Baltimore-Northern Virginia, DC-MD-VA-WV CSA	WV	Berkeley	All
	WV	Jefferson	All
	MD	Washington	All

West Virginia Metropolitan Assessment Areas			
AA Name	State	County	Tracts
Charleston-Huntington-Ashland, WV-OH-KY*	WV	Boone	All
	WV	Kanawha	All
	WV	Putnam	All
	WV	Cabell	All
	WV	Lincoln	All
	WV	Logan	All
	WV	Wayne	All
	OH	Lawrence	0505.00, 0510.02, 0511.00 – 0514.01
Morgantown, WV	WV	Monongalia	All
	WV	Preston	All
Parkersburg-Marietta-Vienna, WV-OH	WV	Wood	All
Weirton-Steubenville, WV-OH*	WV	Brooke	All
	WV	Hancock	All
	OH	Jefferson	All
Beckley, WV	WV	Fayette	All
	WV	Raleigh	All

* Bank does not have branches in the Ohio portions of the Charleston-Huntington-Ashland and Weirton-Steubenville MSAs.

West Virginia NonMetropolitan Assessment Areas			
AA Name	State	County	Tracts
Braxton	WV	Braxton	All
	WV	Gilmer	All
	WV	Harrison	All
	WV	Lewis	All
	WV	Nicholas	All
	WV	Ritchie	All
	WV	Webster	All
Jackson	WV	Jackson	All

Pennsylvania Metropolitan Assessment Area			
AA Name	State	County	Tracts
Pittsburgh, PA MSA	PA	Fayette	All

CRA APPENDIX F

GLOSSARY

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

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

Activities that revitalize or stabilize-

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

Loans, investments, and services that-

- (i) Support, enable or facilitate projects or activities that meet the "eligible uses" criteria described in Section 2301(c) of the Housing and Economic Recovery Act of 2008 (HERA), Public Law 110-289, 122 Stat. 2654, as amended, and are conducted in designated target areas identified in plans approved by the United States Department of Housing and Urban Development in accordance with the Neighborhood Stabilization Program (NSP);
- (ii) Are provided no later than two years after the last date funds appropriated for the NSP are required to be spent by grantees; and
- (iii) Benefit low-, moderate-, and middle-income individuals and geographies in the bank's assessment area(s) or areas outside the bank's assessment area(s) provided the bank has adequately addressed the community development needs of its assessment area(s).

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

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

Full-scope review: Performance under the Lending, Investment, and Service Tests 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 under the Lending, Investment, and Service Tests 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) and the Thrift Financial Reporting (TFR) 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 Report of Condition and Income (Call Report). These loans have original amounts of \$500,000 or less and are either secured by farmland, or are classified as loans to finance agricultural production and other loans to farmers.

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.