

PUBLIC DISCLOSURE

February 2, 1998

COMMUNITY REINVESTMENT ACT PERFORMANCE EVALUATION

Bank: WesBanco Bank Barnesville
#04390440
101 East Main Street
Barnesville, Ohio 43713

Supervisory Agency: Federal Reserve Bank of Cleveland
P.O. Box 6387
Cleveland, Ohio 44101-1387

NOTE: 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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I. GENERAL INFORMATION

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

This document is an evaluation of the Community Reinvestment Act ("CRA") performance of WesBanco Bank Barnesville prepared by The Federal Reserve Bank of Cleveland, the institution's supervisory agency, as of February 2, 1998. The agency evaluates performance in assessment area(s), as they are delineated by the institution, rather than individual branches. This assessment area evaluation may include the visits to some, but not necessarily all of the institution's branches. The agency rates the CRA performance of an institution consistent with the provisions set forth in Appendix A of 12 CFR Part 228.

II. DESCRIPTION OF INSTITUTION

WesBanco Bank Barnesville (“WBB”) is a subsidiary of WesBanco, Inc. WBB is headquartered in Barnesville, Ohio while WesBanco, Inc. is headquartered in Wheeling, West Virginia. WesBanco, Inc. owns six banks in West Virginia, one bank in Ohio, a mortgage company, and a properties company. WesBanco, Inc. had total assets of \$1.7 billion as of September 30, 1997.

WBB had total assets of \$155.3 million as of September 30, 1997, which comprised approximately 9% of the bank holding company’s total assets.

WesBanco Bank Barnesville operates six branches throughout Belmont County and Monroe County in Ohio. These branches serve a wider assessment area that includes portions of Guernsey County and Noble County in Ohio. A detailed discussion of the bank’s assessment area can be found in the “Description of Assessment Area” section of this report. WBB is a full-service financial institution with a primary business focus on residential real estate and consumer lending. Table 1 presents selected financial information for WBB and its national peer group.

Ratio	Bank	Peer
Return on Average Assets	1.14%	1.24%
Net Loans & Leases to Average Assets	56.26%	62.00%
Investments to Average Assets	37.70%	29.52%
Total Deposits to Average Assets	87.47%	87.51%
Net Loans & Leases to Total Deposits	60.90%	72.17%
1-4 Family Residential Loans to Average Loans	53.73%	28.81%
Consumer Loans to Average Loans	19.72%	10.26%
Commercial Loans* to Average Loans	16.30%	44.43%

* Includes commercial & industrial loans, commercial real estate loans, and construction & development loans

WesBanco Bank Barnesville’s asset size and financial condition indicate that it has the ability to meet the credit needs of its assessment area. There are no legal or other impediments that would hamper WBB’s ability to meet the community’s credit needs.

III. DESCRIPTION OF ASSESSMENT AREA

WesBanco Bank Barnesville’s assessment area includes Belmont and Monroe Counties and a portion of Guernsey and Noble Counties in Ohio. Belmont County is part of Metropolitan Statistical Area (“MSA”) 9000 in Wheeling, WV. This MSA includes Belmont County in Ohio and Marshall and Ohio Counties in West Virginia. Guernsey, Monroe, and Noble Counties are not located in a metropolitan area. WBB excluded Marshall and Ohio Counties in West Virginia and the remaining portions of Guernsey and Noble Counties in Ohio from its assessment area. This exclusion is reasonable because the bank’s assessment area includes only the portion of the respective political subdivisions that it reasonably may be expected to serve. This is primarily due to the location of WBB’s offices in Belmont and Monroe Counties and the distance of these offices from the excluded areas. The assessment area complies with the requirements of the Community Reinvestment Act and does not arbitrarily exclude low- or moderate-income geographies (i.e. census tracts or block numbering areas).

While Belmont County is located in a metropolitan area and Guernsey, Monroe, and Noble Counties are located in non-metropolitan areas, the counties share similar economic and demographic profiles. Employment is provided predominately by retail, service, government, and manufacturing industries. However, Monroe and Noble Counties have a larger agricultural base. While Belmont County comprises approximately 76% of the assessment area’s population, residents in all four counties have similar income levels.

The area median household income of \$20,943 for the assessment area is lower than the area median household income of \$21,831 for MSA 9000, \$25,910 for statewide non-metropolitan areas, and \$28,706 for the State of Ohio. The term “households” includes all residents of a house, regardless of family status. The area median family income of \$25,635 for the assessment area is lower than the area median family income of \$27,288 for MSA 9000, \$30,563 for non-metropolitan areas, and \$34,351 for the State of Ohio. The term “families” includes only residents of a house who are related. Tables 2 and 3 present relevant demographic information for the assessment area.

Type of Geography*	# and % of Geographies	# and % of Population	# and % of Households	# and % of Families	# and % of OO** Units
Low-income	0 0%	0 0%	0 0%	0 0%	0 0%
Moderate-income	5 19.2%	13,735 14.7%	5,336 14.7%	3,838 14.3%	3,797 13.8%
Middle-income	19 73.1%	71,575 76.6%	27,665 76.3%	20,580 76.9%	21,255 77.3%
Upper-income	2 7.7%	8,090 8.7%	3,290 9.0%	2,364 8.8%	2,413 8.9%
Total Assessment Area	26	93,400	36,281	26,782	27,465

- * Geographies are classified as follows: low-income geographies have median family incomes of less than 50% of the area median family income, moderate-income geographies have median family income from 50% to less than 80% of the area median family income, middle-income geographies have median family income from 80% to less than 120% of the area median family income, and upper-income geographies have median family income equal to or greater than 120% of the area median family income.
- ** Owner-occupied units.

TABLE 3 DEMOGRAPHIC DATA BY INCOME LEVEL				
Income Level*	# of Households	% of Households	# of Families	% of Families
Low-income	9,841	27.1%	6,243	23.3%
Below Poverty Level**	6,541	18.0%	3,942	14.7%
Moderate-income	6,005	16.6%	5,359	20.0%
Middle-income	6,630	18.3%	5,888	22.0%
Upper-income	13,805	38.1%	9,292	34.7%

- * Income levels are classified as follows: low-income households/families have median incomes less than 50% of the area median household/family income, moderate-income households/families have median incomes from 50% to less than 80% of the area median household/family income, middle-income households/families have median income from 80% to less than 120% of the area median household/family income, and upper-income households/families have median income equal to or greater than 120% of the area median household/family income.
- ** Subset of low-income households/families.

The assessment area has a slightly higher percentage of households and families within the low- and moderate-income levels than MSA 9000, non-metropolitan Ohio, and the State of Ohio. The number of households and families below the poverty level in the assessment area are slightly higher than MSA 9000 and approximately 5% higher than the non-metropolitan and state levels.

The assessment area has 40,397 housing units. Of these, 68% are owner-occupied, 22% are rental units, and 10% are vacant. One- to four-family units comprise 83% of the housing stock, while multi-family units of five or more comprise 6% and mobile homes comprise 10% of the remaining housing stock. The median housing value is \$40,742, and the median gross rent is \$283 per month. The median housing age is 41 years. These percentages are comparable to MSA 9000 and non-metropolitan Ohio and slightly higher than the State of Ohio.

The local economy in Belmont County is strong, but the unemployment rate of Monroe County is double the state average. Table 4 details the unemployment rates by county compared with the respective state and national averages for November 1997.

TABLE 4	
UNEMPLOYMENT RATE AS OF NOVEMBER 1997	
Belmont County	5.7%
Guernsey County	6.7%
Monroe County	8.8%
Noble County	6.4%
State of Ohio	4.2%
United States	4.3%

Two community contacts were conducted in connection with the examination. Both meetings were held with quasi-governmental entities that primarily administer block grant money for the State of Ohio. The primary needs identified through these contacts was affordable housing for low- and moderate-income residents, including downpayment assistance and rehabilitation loans for properties to meet minimum code requirements. A need for speculative commercial development was also identified. Such development is needed to draw interest and initiate development in commercial /industrial parks that currently exist.

IV. INSTITUTION RATING

This institution is rated satisfactory. Major factors contributing to this rating include:

- Lending levels reflect good responsiveness to credit needs.
- Substantial majority of loans in the institution's assessment area.
- Good geographic distribution of loans throughout the assessment area and among retail and business customers of different income and revenue levels.
- Relatively high level of community development loans, investments, and services.

CONCLUSIONS WITH RESPECT TO PERFORMANCE CRITERIA

Lending Test

Lending Activity

WesBanco Bank Barnesville originated over 3,200 loans totaling more than \$32 million from April 22, 1996 through December 31, 1996. Lending activity decreased in 1997 with 1,465 loans originated totaling nearly \$17 million. Management indicated that indirect motor vehicle lending was transferred to its affiliate in Wheeling, WV in August 1996. This indirect lending accounted for approximately \$5.5 million of the decline in loan volume. Management also attributed the decreased loan volume to the loss of the Chief Executive Officer and a lending officer who were both prominent members of the community. Within performance context considerations, WesBanco Bank of Barnesville's lending performance reflects good responsiveness to assessment area credit needs.

Tables 5 and 6 show the number and amount of lending, by loan product, originated by the bank since the previous examination. The majority of lending is concentrated in the consumer and home mortgage loan categories, which reflects the bank's retail focus. Mortgage lending remains significant, reflecting a representational increase as a percentage of the dollar volume of lending in 1997 when overall lending levels decreased.

Loan Type	Number of Loans	% of Total Loans	Amount of Loans**	% of Total Loans
Consumer	2,645	80.1%	\$15,136	46.8%
Motor Vehicle	858	26.0%	8,584	26.5%
Other Consumer	1,787	54.1%	6,552	20.3%
Home Mortgage	285	8.6%	\$10,529	32.6%
Home Purchase	113	3.4%	4,622	14.3%
Refinance	133	4.0%	5,635	17.4%
Home Improvement	39	1.2%	272	.9%

Small Business	374	11.3%	6,659	20.6%
Total	3,304	100%	\$32,324	100%

* April 22, 1996 – December 31, 1996

** In thousands

TABLE 6				
1997 LENDING BY LOAN PRODUCT				
Loan Type	Number of Loans	% of Total Loans	Amount of Loans*	% of Total Loans
Consumer	1,025	71.7%	\$5,604	33.4%
Motor Vehicle	250	17.5%	1,711	10.2%
Other Consumer	775	54.2%	3,893	23.2%
Home Mortgage	271	19.0%	\$8,910	53.2%
Home Purchase	100	7.0%	4,649	27.8%
Refinance	89	6.2%	3,814	22.8%
Home Improvement	82	5.8%	447	2.6%
Small Business	133	9.3%	\$2,239	13.4%
Total	1,429	100%	\$16,753	100%

* In thousands

Tables 7 and 8 show the number and amount of the institution's lending inside the assessment area by loan product. A substantial majority of WBB's lending is concentrated within the assessment area.

TABLE 7				
1996* LENDING WITHIN ASSESSMENT AREA BY LOAN PRODUCT				
Loan Type	Number of Loans	% of Total Loans	Amount of Loans**	% of Total Loans
Consumer	2,336	88.3%	\$12,265	81.0%
Motor Vehicle	707	82.4%	\$6,492	75.6%
Other Consumer	1,629	91.2%	\$5,773	88.1%
Home Mortgage	267	93.7%	\$9,690	92.0%
Home Purchase	106	93.8%	\$4,307	93.2%
Refinance	123	92.5%	\$5,151	91.4%
Home Improvement	38	97.4%	\$232	85.3%
Small Business	324	86.6%	\$5,883	88.3%
Total	2,927	88.6%	\$27,838	86.1%

* April 22, 1996 – December 31, 1996

** In thousands.

TABLE 8				
1997 LENDING WITHIN ASSESSMENT AREA BY LOAN PRODUCT				
Loan Type	Number of Loans	% of Total Loans	Amount of Loans*	% of Total Loans
Consumer	940	91.7%	\$4,828	86.2%
Motor Vehicle	231	92.4%	\$1,517	88.7%
Other Consumer	709	91.5%	\$3,311	85.1%
Home Mortgage	251	92.6%	\$8,170	91.7%
Home Purchase	92	92.0%	\$4,281	92.1%

Refinance	82	92.1%	\$3,477	91.2%
Home Improvement	77	93.9%	\$412	92.2%
Small Business	123	92.5%	\$1,935	86.4%
Total	1,314	92.0%	\$14,933	89.1%

* In thousands.

Geographic Distribution

In addition to the concentration of lending inside the assessment area, the geographic distribution of the loans in the assessment area is considered in evaluating lending performance. Loans are evaluated based upon their distribution among geographies and compared to the combined percentage of geographies by income level and the population within these geographies as defined by 1990 Census information. Further comparisons are included as deemed relevant. The geographic distribution of WBB's loans demonstrates a good penetration throughout its assessment area.

Tables 9 and 10 reflect the number and dollar amount of consumer lending within geographic income classification categories as a percentage of lending within each category type.

Type of Loan	Low-Income	Moderate-Income	Middle-Income	Upper-Income
Motor Vehicle**	0%	16.0%	80.2%	3.8%
	0%	15.8%	78.5%	5.7%
Other Consumer**	0%	15.8%	81.2%	3.0%
	0%	13.9%	80.4%	5.7%
Geographies***	0%	19.2%	73.1%	7.7%
Population***	0%	14.7%	76.6%	8.7%

* April 22, 1996 – December 31, 1996

** Number and amount of consumer loans as a percentage of consumer loans in each category.

*** Geographies and population as a percent of entire assessment area.

Type of Loan	Low-Income	Moderate-Income	Middle-Income	Upper-Income
Motor Vehicle*	0%	23.4%	74.0%	2.6%
	0%	23.9%	72.0%	4.1%
Other Consumer*	0%	19.2%	76.7%	4.1%
	0%	17.9%	72.5%	9.6%
Affiliate Lending**	0%	17.9%	75.9%	6.2%
	0%	17.8%	74.5%	7.7%
Geographies***	0%	19.2%	73.1%	7.7%
Population***	0%	14.7%	76.6%	8.7%

- * Number and amount of consumer loans as a percentage of consumer loans in each category.
- ** Indirect motor vehicle loans originated by affiliate bank.
- *** Geographies and population as a percent of entire assessment area.

The tables show a representational distribution of consumer loans compared to both population and geographies within the assessment area in 1996 and an improved distribution of loans in moderate-income geographies in 1997. The overall lending activity among geographies of varying income levels reflects good penetration throughout the assessment area.

Tables 11 and 12 show the geographic distribution of the bank's mortgage lending in 1996 and 1997 compared to the percentage of geographies by income level in the assessment area, the population residing within each geography, and the percentage of owner-occupied housing units within each geography. Mortgage lending for 1996 is also compared to the aggregate lending activity within the assessment area. This data includes mortgage lending within the assessment area for all institutions, except WBB, required to report mortgage lending data as required by the Home Mortgage Disclosure Act.

TABLE 11				
DISTRIBUTION OF 1996* MORTGAGE LOANS BY GEOGRAPHY				
Type of Loan	Low-Income	Moderate-Income	Middle-Income	Upper-Income
Home Purchase Loans **	0%	17.9%	72.6%	9.4%
	0%	18.8%	67.8%	13.4%
Home Refinance Loans **	0%	7.3%	83.7%	8.9%
	0%	6.3%	84.9%	8.8%
Home Improvement Loans **	0%	13.2%	86.8%	0%
	0%	12.1%	87.9%	0%
WBB's Total Mortgage Lending	0%	12.4%	79.8%	7.9%
	0%	12.0%	77.3%	10.7%
Aggregate Mortgage Loans (All Lenders)	0%	7.8%	77.4%	14.8%
	0%	7.3%	72.3%	20.4%
Geographies***	0%	19.2%	73.1%	7.7%
Population***	0%	14.7%	76.6%	8.7%
Owner-Occupied Housing Units***	0%	13.4%	77.4%	8.8%

- * April 22, 1996 – December 31, 1996
- ** Number and amount of mortgage loans as a percentage of total mortgage loans in MSA portion of assessment area.
- *** Geographies, population, and owner-occupied housing units contained within MSA portion of assessment area only.

TABLE 12				
DISTRIBUTION OF 1997 MORTGAGE LOANS BY GEOGRAPHY				
Type of Loan	Low-Income	Moderate-Income	Middle-Income	Upper-Income
Home Purchase Loans *	0%	16.3%	77.2%	6.5%
	0%	11.6%	78.9%	9.4%
Home Refinance Loans *	0%	14.6%	75.6%	9.8%
	0%	13.2%	76.2%	10.6%
Home Improvement Loans *	0%	16.9%	74.0%	9.1%
	0%	12.4%	76.7%	10.9%
WBB's Total Mortgage Lending	0%	15.9%	75.7%	8.4%
	0%	12.4%	77.6%	10.0%
Geographies**	0%	19.2%	73.1%	7.7%
Population**	0%	14.7%	76.6%	8.7%
Owner-Occupied Housing Units**	0%	13.4%	77.4%	8.8%

* Number and amount of mortgage loans as a percentage of total mortgage loans in entire assessment area.

** Geographies, population, and owner-occupied housing units contained within the entire assessment area.

The tables show a representational distribution of mortgage loans compared to population, geographies, and owner-occupied units within the assessment area. WBB's mortgage lending in 1996 outperformed the aggregate of other lenders in the assessment area. Lending to moderate-income geographies slightly improved in 1997. The overall lending activity among geographies of varying income levels reflects good penetration throughout the assessment area.

Tables 13 and 14 show the number and amount of small business loans within the assessment area. These percentages are compared to the percentage of geographies by income level and aggregate small business lending activity reported in the assessment area in 1996. This data includes lending activity in the assessment area for all institutions, including WBB, required to report small business lending data as required by the Community Reinvestment Act ("CRA"). There were a minimal number of small farm loans extended during the evaluation period, so no analysis would be meaningful. Management indicated the bank does originate loans to farmers; however, the majority of its small farm lending does not meet the definition as stated in the CRA, thus it is not reported.

TABLE 13				
DISTRIBUTION OF 1996* SMALL BUSINESS LOANS BY GEOGRAPHY				
Type of Loan	Low-Income	Moderate-Income	Middle-Income	Upper-Income
Small Business Loans **	0%	12.9%	81.2%	5.9%
	0%	8.0%	84.4%	7.6%
Aggregate Small Business Lending	0%	16.5%	72.3%	11.2%
	0%	11.1%	54.4%	34.5%
Geographies***	0%	19.2%	73.1%	7.7%

- * April 22, 1996 – December 31, 1996
- ** Number and amount of Small Business loans as a percentage of total Small Business loans.
- *** Geographies as a percent of the entire assessment area.

TABLE 14				
DISTRIBUTION OF 1997 SMALL BUSINESS LOANS BY GEOGRAPHY				
Type of Loan	Low-Income	Moderate-Income	Middle-Income	Upper-Income
Small Business Loans *	0%	12.2%	82.9%	4.9%
Geographies**	0%	19.2%	73.1%	7.7%

- * Number and amount of Small Business loans as a percentage of total Small Business loans.
- ** Geographies as a percent of the entire assessment area.

The tables reflect a slightly lower penetration in moderate-income tracts compared to aggregate percentages and an even lower penetration compared to geography composition. However, it is noted that aggregate percentages are inclusive of WBB’s lending efforts. When geographic comparisons were discussed, management indicated that all small business and small farm lending efforts were not included in the table above. Management further explained that two of the moderate-income geographies are located in Monroe County, a depressed area consisting primarily of farming communities. Loans to persons/businesses within these areas and other areas are typically not included as reportable small business or small farm loans due to nonconforming criteria. Therefore, the institution is not able to demonstrate lending efforts to these types of entities. The bank’s geographic distribution of small business lending is considered reasonable and representative in light of performance context and data reporting considerations.

Borrower Distribution

A further indicator of the institution’s lending efforts is reflected in an analysis of the actual incomes and revenues of borrowers used in granting credit, when income or revenue was provided. Borrowers are classified according to 1996 and 1997 median family income estimates from the Department of Housing and Urban Development. Statewide non-metropolitan median family income figures for Ohio were used in determining the income levels of borrowers outside the MSA, while borrowers within the MSA were classified according the MSA median family income figures. Aggregate reporting figures were used to analyze WBB’s lending activity when available. Comparisons of the bank’s borrower distribution with population and aggregate distributions demonstrate a good representation among retail customers of different income levels and business customers of different sizes.

Tables 15 and 16 indicate the number and amount of the institution’s consumer lending, by category, as a percentage of total loans within each category type. Lending levels are compared with the percentage of families and households within respective income classifications.

TABLE 15	
DISTRIBUTION OF 1996* CONSUMER LOANS BY BORROWER INCOME	

Type of Loan	Low-Income	Moderate-Income	Middle-Income	Upper-Income
Motor Vehicle*	25.7%	25.9%	24.8%	22.9%
	17.6%	23.7%	26.8%	31.0%
Other Consumer*	33.9%	24.0%	21.2%	19.8%
	17.0%	22.3%	24.7%	33.6%
Families***	23.3%	20.0%	22.0%	34.7%
Households***	27.1%	16.6%	18.3%	38.1%

* April 22, 1996 – December 31, 1997

** Number and amount of consumer loans as a percentage of consumer loans in each category.

*** Families/Household classified using 1996 HUD estimated MFI for the MSA and the non-metropolitan areas.

TABLE 16				
DISTRIBUTION OF 1997 CONSUMER LOANS BY BORROWER INCOME				
Type of Loan	Low-Income	Moderate-Income	Middle-Income	Upper-Income
Motor Vehicle*	39.4%	19.9%	20.3%	18.6%
	25.3%	20.4%	24.5%	27.8%
Other Consumer*	32.9%	26.7%	20.0%	18.9%
	12.4%	26.4%	16.9%	41.8%
Affiliate Lending**	18.6%	29.0%	20.7%	31.7%
	15.3%	23.2%	21.0%	40.5%
Families within assessment area***	23.3%	20.0%	22.0%	34.7%
Households within assessment area***	27.1%	16.6%	18.3%	38.1%

* Number and amount of consumer loans as a percentage of consumer loans in each category.

** Indirect motor vehicle loans originated by affiliate bank.

*** Families/Household classified using 1996 HUD estimated MFI for the MSA and the non-metropolitan areas.

A comparison of consumer lending to low- and moderate-income borrowers relative to the respective proportion of families and households in the assessment area indicates strong performance in lending to these individuals. Performance in 1997 improved as compared to 1996.

The percentage by number of consumer loans extended is considered more significant in comparing the low- and moderate-income categories as these categories of borrowers can typically afford loans in smaller amounts.

Tables 17 and 18 indicate the number and amount of the institution's mortgage lending, by category, as a percentage of total loans within each category type. Lending levels are compared with the percentage of families and households within respective income classifications. Aggregate lending activity data within the assessment area is utilized in 1996 lending comparisons. This data includes lending activity in the assessment area for all institutions, except WBB, required to report mortgage lending data as required by the Home Mortgage Disclosure Act.

TABLE 17					
DISTRIBUTION OF 1996* MORTGAGE LOANS BY BORROWER INCOME					
Type of Loan	Low-Income	Moderate-Income	Middle-Income	Upper-Income	
Home Purchase Loans **	9.4%	30.2%	17.0%	42.5%	
	2.3%	22.6%	15.1%	58.7%	
Home Refinance Loans **	8.1%	17.9%	31.7%	41.5%	
	3.6%	11.6%	30.8%	53.8%	
Home Improvement Loans **	18.4%	36.8%	23.7%	21.1%	
	12.9%	28.4%	29.3%	29.3%	
WBB's Total Mortgage Lending	10.1%	25.5%	24.7%	39.0%	
	3.3%	16.9%	23.8%	55.4%	
Aggregate Mortgage Loans (All Lenders)	8.2%	18.6%	24.2%	41.8%	
	3.4%	12.2%	22.7%	53.3%	
Families**	23.3%	20.0%	22.0%	34.7%	
Households**	27.1%	16.6%	18.3%	38.1%	

* April 22, 1996 – December 31, 1997

** Number and amount of mortgage loans as a percentage of mortgage loans in each category.

*** Families/Household classified using 1996 HUD estimated MFI for the MSA and the non-metropolitan areas.

TABLE 18					
DISTRIBUTION OF 1997 MORTGAGE LOANS BY BORROWER INCOME					
Type of Loan	Low-Income	Moderate-Income	Middle-Income	Upper-Income	
Home Purchase Loans *	9.8%	23.9%	27.2%	39.1%	
	2.9%	15.5%	23.5%	58.1%	
Home Refinance Loans *	8.5%	17.1%	40.2%	31.7%	
	3.6%	11.8%	41.1%	41.9%	
Home Improvement Loans *	13.0%	37.7%	28.6%	19.5%	
	5.8%	30.8%	38.6%	22.3%	
WBB's Total Mortgage Lending	10.4%	25.9%	31.9%	30.7%	
	3.4%	14.7%	31.8%	49.4%	
Families**	23.3%	20.0%	22.0%	34.7%	
Households**	27.1%	16.6%	18.3%	38.1%	

** Number and amount of mortgage loans as a percentage of mortgage loans in each category.

*** Families/Household classified using 1996 HUD estimated MFI for the MSA and the non-metropolitan areas.

The distribution of mortgage lending by borrower income is fairly consistent in 1996 and 1997. Lending to low-income borrowers is somewhat lower than the family and household representation in the assessment area. However, it is reasonable to expect low-income lending at levels not fully representative of family and household demographics because as income levels decrease, the amount of discretionary income available is increasingly impacted, decreasing the affordability of a monthly mortgage payment. Favorable comparison in mortgage lending to moderate-income

borrowers is reflected in both 1996 and 1997. WBB's record of lending to low- and moderate-income borrowers is slightly better than the aggregate of all lenders for 1996. Overall lending distribution and lending to low- and moderate-income borrowers, combined, reflects good penetration among retail customers of varying income levels.

Tables 19 and 21 show the distribution of small business loans by loan amount at origination, while tables 20 and 22 show the distribution of loans by gross revenues of the businesses. Comparisons of both loan amount and gross revenues of the business are conducted to serve as indicators of true small business lending to small businesses. These percentages are compared to the same characteristics for aggregate small business lending activity reported in the assessment area in 1996. This data includes lending activity in the assessment area for all institutions, including WBB, required to report small business lending data as required by the CRA. There were a minimal number of small farm loans extended during the evaluation period, so no analysis would be meaningful. Management indicated the bank does originate loans to farmers; however, the majority of its small farm lending does not meet the definition as stated in the CRA, thus it is not reported.

TABLE 19			
DISTRIBUTION OF 1996* SMALL BUSINESS LOANS			
BY LOAN AMOUNT AT ORIGATION			
Type of Loan	Loan Amount <= \$100,000	Loan Amount >\$100,000 and <= \$250,000	Loan Amount > \$250,000
Small Business**	97.8%	1.5%	0.7%
	77.0%	11.0%	12.0%
Aggregate Small Business Lending Activity**	95.7%	2.7%	1.6%
	45.6%	19.4%	35.0%

* April 22, 196 – December 31, 1996

** Number and amount of small business loans as a percentage of small business loans in each category.

TABLE 20				
DISTRIBUTION OF 1996* SMALL BUSINESS LOANS				
WITH GROSS ANNUAL REVENUES LESS THAN \$1 MILLION				
Type of Loan	Number of Loans	% of Total Loans	Amount of Loans*	% of Total Amount
Small Business	13	4.0%	\$674	11.5%
Aggregate Small Business Lending Activity	325	19.5%	\$14,947	41.4%

* April 22, 196 – December 31, 1996

In 1996, WBB extended a substantial majority, both by number and dollar volume, of loans in amounts less than \$100,000. The distribution of the *dollar volume* of loans less than \$100,000 for the institution represents a significantly higher portion of lending activity for WBB than the aggregate. The distribution of the *number* of loans within respective loan size categories is similar for both the institution and aggregate figures. However, WBB's lending to small businesses with gross annual revenues less than \$1 million is significantly lower than the aggregate of all lenders.

TABLE 21 DISTRIBUTION OF 1997 SMALL BUSINESS LOANS BY LOAN AMOUNT AT ORIGATION			
Type of Loan	Loan Amount <= \$100,000	Loan Amount >\$100,000 and <= \$250,000	Loan Amount > \$250,000
Small Business*	99.2%	0.8%	0%
	89.7%	10.3%	0%

* Number and amount of small business loans as a percentage of small business loans in each category.

TABLE 22 DISTRIBUTION OF 1997 SMALL BUSINESS LOANS WITH GROSS ANNUAL REVENUES LESS THAN \$1 MILLION				
Type of Loan	Number of Loans	% of Total Loans	Amount of Loans*	% of Total Amount
Small Business	25	7.6%	\$941	15.3%

The trend for small business lending in 1997 is consistent with that of 1996, reflecting similar distributions in all categories. In 1997, WBB extended a substantial majority, both by number and dollar volume, of loans in amounts less than \$100,000.

Community Development Loans

WesBanco Bank Barnesville originated a relatively high level of community development (“CD”) loans given its size, capacity, and the limited opportunity to make these types of loans within its assessment area. All of the bank’s CD loans were used to fund affordable housing initiatives, which was identified as a primary credit need by community contacts. While the bank’s CD loans were neither innovative nor flexible, they were effective in meeting the credit needs of the local community.

WesBanco originated six community development loans for approximately \$319,000. The largest loans are described below:

- A loan to a development corporation for a 33-acre affordable housing real estate development initiative in the Village of Barnesville. Two loans were originated for the purchase and development of raw land. One home has been completed and construction has started on four other homes. The homes are priced well below market and are targeted for sale to moderate-income families.
- A loan to a local community investment corporation that administers grant block funds for rehabilitation and first time home buyer projects within Monroe county. Loan funds were used to construct a building in an industrial park. The building was constructed as part of a plan to attract businesses and create new jobs in the area.
- A line of credit to a local resident for the purchase and rehabilitation of a multi-family complex

in Martins Ferry. The building has seven units and is located in a moderate-income geography. Residents of the apartment are primarily low-income, although some of the tenants are moderate-income.

Flexible Lending Criteria/Innovative Loans

Flood Relief Loans were innovative, unsecured, home improvement or appliance purchase loans offered by WBB during 1996 when the area suffered severe flooding. These loans were extended to any qualifying resident who had been affected by the flood. Loans were extended for a maximum of \$5,000 per residence at 5% fixed rate interest for a five-year period.

“No Cost” Home Equity Loans are flexible, closed-end loans that do not require the borrower to pay any settlement costs. These loans target borrowers with limited funds for settlement purposes, many of which are low- or moderate-income. The program began during 1996. As of December 31, 1997, the bank had 97 outstanding loans for \$1.3 million.

Linked Deposit Loan Programs are flexible lending programs that provide below market rate loans to small businesses in the bank’s assessment area. The bank participates in several of these programs including the Ohio Linked Deposit and the Barnesville Chamber of Commerce Business Development Linked Deposit. During the review period, the bank originated four of these loans for \$163,000.

Community Homebuyers Investment Program (CHIP) is a consortium of banks and nonprofit agencies united to provide homebuyer education and down payment assistance. WBB refers low- and moderate-income families who do not qualify for its standard mortgage product to this consortium. During the review period, the bank originated 2 of these loans for \$26,000.

Investment Test

The bank’s qualified investment volume totaled \$314,000. This volume is good given the fact that few qualified bonds or municipality issuances exist in the bank’s assessment area. Approximately 30 agencies that cater to the needs of low- and moderate-income persons are located in WBB’s assessment area. While many of these agencies are not positioned to receive loans, they are amenable to grants and donations from private industry. The bank made donations to 21 of these groups. Neither WBB’s investments or donations are considered complex or innovative; however, they are effective in meeting the needs of the community.

The bank’s investments are detailed below:

The bank purchased six bonds issued by the Belmont County Ohio Correctional Facility. The bonds were issued to finance the construction of a facility that is located in a moderate-income area. Construction of the facility created over 200 jobs. These jobs offer predominately moderate-income.

WesBanco made donations to several organizations that provided social services to low- and moderate-income persons. Some of the largest grants were made to the following organizations:

- St. Clairsville Area Council of Churches, Food Pantry
- Barnesville Hospital Capital Campaign
- Belmont County Society for Crippled Children and Adults
- Great Western School Program
- Woodsfield Emergency Squad
- Neighborhood Service Center

Service Test

Retail Banking Services

WesBanco Bank Barnesville’s delivery systems are accessible to essentially all portions of the bank’s assessment area. The current distribution of WBB’s six branches among geographies of different income levels within the assessment area is well represented in comparison to the demographics of the area. In addition, to the extent that changes in branch locations have been made, WBB’s opening and closing of branches has not adversely affected the accessibility of its delivery systems, particularly in low-and moderate-income geographies and/or to low-and moderate-income individuals. Since the previous CRA evaluation period, WBB has not closed any branches and has opened one additional branch in St. Clairsville, Ohio. Although this new branch is located in an upper-income geography, approximately 22% of the families in the upper-income tracts are low- and moderate-income families. Table 23 shows the bank’s distribution of branches by geography

TABLE 23 DISTRIBUTION OF BRANCHES BY GEOGRAPHY				
Type of Geography	# of Branches	% of Branches	% of Total Population	% of Total Geographies
Low-income	0	0%	0%	0%
Moderate-income	2	33.3%	14.3%	19.2%
Middle-income	3	50.0%	76.6%	73.1%
Upper-income	1	16.7%	8.7%	7.7%

The geographic distribution of WBB’s offices is reasonable. Two of the six offices are located in moderate-income geographies in Monroe County. In addition, the distribution of the four offices in Belmont County serves a larger geographical portion of Belmont County, which includes the largest retail services that draw from the bank’s entire assessment area.

WBB's alternative delivery systems enhance the services offered by the bank's branches. WBB has three ATM facilities - one each in a moderate-, middle-, and upper-income geography. Two of these ATMs were installed since the previous CRA evaluation. In addition, WBB has instituted a 24-hour phone-in customer service program that provides customers access to their accounts 7-days a week. The bank has also implemented a new debit card feature that provides greater access to deposited funds. WBB will also make home visits upon request for disabled customers who are unable to visit the branch site.

Business hours at all branches are deemed reasonable. All locations open at 9:00 a.m. Monday through Saturday. Monday through Wednesday the St. Clairsville office is open until 5:00 p.m. while the remaining offices are open until 4:00 p.m. Two offices are opened on Thursday until 4:00 p.m. and the St. Clairsville office is open until 5:00 p.m. The remaining offices close at noon on Thursday. All locations are opened until 6:00 p.m. Friday and until noon on Saturday. Four offices have drive-up facilities that operate one-half hour before and after the normal business hours of the branch, with Friday hours extending until 7:00 p.m.

All offices, except the Barnesville Lincoln branch offer a full range of deposit and loan products and services. The Lincoln branch is only a few blocks from the main office in Barnesville and customers that want to apply for a loan are referred to that office. In addition, when the main office closes at noon on Thursdays, a loan officer is available at the Lincoln branch so that full services are available in Barnesville until 4:00 p.m.

Community Development Services

The bank provides a relatively high level of community development services given the bank's size and capacity. WBB's products reflect a strong responsiveness to credit and social service needs of the local community, including housing, small business development, and emergency/crisis loans. The services are designed to meet the needs of low- or moderate-income persons, or small businesses. WBB has been proactive in offering services that are innovative or flexible.

Lifeline Checking is a flexible, low cost checking account that targets low-income persons with limited account activity. There is no minimum balance or monthly fee. Thirty-eight of these accounts were opened during the review period.

Health Fund CD is an innovative, five-year certificate of deposit that allows depositors to make partial or full withdrawals without penalty, if the funds are used for medical purposes. The fund targets senior citizens and low- and moderate-income persons who do not have health care insurance. Eight of these accounts were opened during 1997.

Automatic Deduction Christmas Club allows customers to make automatic payroll deductions into a Christmas club account. In order to cater to low-income customers, the bank allows deductions as low as \$2 per week. During the review period, the bank opened 13 of these

accounts.

Numerous bank employees and senior management maintain active involvement, including leadership roles, in a variety of organizations whose primary purpose is to provide economic development or other financial services to low- or moderate-income persons or to small businesses and small farms. The bank's participation in some of these organizations includes:

Bethesda Community Improvement Committee
Monroe County Housing Consortium
Monroe County Chamber of Commerce
Belmont County Farm Bureau
Ridge Runners Farm Bureau Council

WesBanco has forged a referral relationship with Consumer Credit Counseling Service ("CCCS"). The bank refers potential borrowers to CCCS for assistance with current outstanding credit.

During the review period, the bank sponsored five educational seminars. One seminar focused on the CHIP loan program described under the lending test. The other four seminars focused on the bank's deposit products.

Fair Lending

The bank has written Equal Credit Opportunity Act and Fair Housing Act policies and procedures.

Lending personnel are trained on these policies and procedures. WBB has a fair lending committee that reviews denied loan applications to ensure equal treatment. No violations of the substantive provisions of the antidiscrimination laws and regulations were identified.

V. Appendix

SCOPE OF EXAMINATION

The CRA examination of WesBanco Bank Barnesville included a review of the following loan types from April 22, 1996 through December 31, 1997:

- Home purchase, home refinance, and home improvement loans
- Small business loans
- Motor vehicle loans
- All other consumer loans
- Indirect motor vehicle loans originated in the bank's assessment area by its affiliate in Wheeling, WV.