

PUBLIC DISCLOSURE

August 13, 2007

COMMUNITY REINVESTMENT ACT PERFORMANCE EVALUATION

WesBanco Bank, Inc.
RSSD: 645625

One Bank Plaza
Wheeling, West Virginia

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

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

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INSTITUTION'S CRA RATING

INSTITUTION'S CRA RATING: "Outstanding"

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

PERFORMANCE LEVELS	WESBANCO BANK, INC.		
	PERFORMANCE TESTS		
	Lending Test*	Investment Test	Service Test
Outstanding	X	X	X
High Satisfactory			
Low Satisfactory			
Needs to Improve			
Substantial Noncompliance			

Major factors supporting the institution's rating include:

- Lending levels reflect excellent responsiveness to assessment area credit needs;
- A high percentage of loans are made in the bank's assessment areas;
- The geographic distribution of loans reflects good penetration throughout the assessment areas;
- The distribution of borrowers reflects, given the product lines offered, good penetration among customers of different income levels and businesses of different sizes;
- The bank is a leader in making community development loans;
- The bank has an excellent level of qualified community development investments and grants, often in a leadership position;
- Delivery systems are accessible to essentially all portions of the bank's assessment areas.
- The record of opening and closing of branches has not adversely affected the accessibility of its delivery systems, particularly low- and moderate-income geographies and/or low- or moderate-income individuals; and,
- A leader in providing community development services.

DESCRIPTION OF INSTITUTION

WesBanco Bank, Inc. (“WesBanco”) is the sole banking subsidiary of WesBanco, Inc. Both the holding company and the bank are located in Wheeling, West Virginia. In addition to the bank, the holding company owns WesBanco Securities, Inc., a securities broker/dealer. The bank owns two entities, WesBanco Asset Management, Inc., and WesBanco Insurance Services. The asset management company, in turn, owns WesBanco Services, Inc., which holds investment securities and real estate loans for the bank. The bank’s asset size as of June 30, 2007 was \$4.0 billion.

WesBanco offers personal and business checking, savings, and time accounts. Consumer loans include new automobile, unsecured, CD/savings secured, student loans, home equity loans, and lines of credit. Different types of mortgage loans are available, such as conventional fixed rate, conventional adjustable rate, conventional jumbo, VA/FHA, first-time home buyer, low-income programs, and reverse mortgages. Business loans are also offered, including lines of credit, term loans, and commercial credit cards.

WesBanco’s website, www.wesbanco.com, contains information about the organization and its history, office locations, personal and business banking, brokerage services, employment, and investor relations. On-line banking offers services such as bill payment and cash management options.

WesBanco has 78 offices and 108 automatic teller machines (“ATMs”) throughout West Virginia, Ohio, and Pennsylvania. Since the previous examination, there were four branch closures and one branch opening. There were also four relocations. On March 17, 2006, WesBanco sold four branches to Union Bank, Inc., Middlebourne, West Virginia. These four branches were all middle-income distressed and/or underserved middle-income tracts located in Ritchie County, West Virginia. The sale of these offices represented WesBanco’s departure from this county; however, as of the date of this public evaluation, the four offices remain open as Union Bank and banking services in the county were not adversely affected.

The bank’s assessment area includes portions of West Virginia and southern Ohio. Most of Washington County in Pennsylvania is also included. Since the previous examination, Hamilton County, which is located in the Cincinnati-Middletown metropolitan statistical area (“MSA”), has been added to the assessment area. This is due to WesBanco’s acquisition of The Winton Savings and Loan Company in 2005. Further, Jackson County, West Virginia is considered a separate assessment area because it is located in the nonmetropolitan area. Although separate, Jackson County is contiguous with the Charleston MSA to the south and the Parkersburg-Marietta MSA to the north.

On July 20, 2007, it was announced that Oak Hill Financial, Inc. (“Oak Hill”) in Jackson, Ohio would merge into WesBanco, Inc. Oak Hill is the parent of Oak Hill Banks. According to the press release, Oak Hill had assets of \$1.3 billion as of June 30, 2007. The merger will expand the institution’s presence in the Cincinnati, Columbus, Dayton, and Springfield markets. The transaction is expected to take place by the end of this year.

The 2006 average annual unemployment rates for the three states in which WesBanco has offices were all higher than the nationwide average. The unemployment rates for West Virginia, Ohio, and Pennsylvania were 4.9%, 5.5%, and 4.7% compared to the U.S. rate of 4.6%. Out of the 50 states and the District of Columbia, West Virginia ranked 35th, Ohio ranked 45th, and Pennsylvania ranked 31st.¹ The unemployment rates for each assessment area are discussed in more detail in the assessment area portions of this report.

From 1990 to 2000, the population growth in the three states lagged than the nationwide growth rate. Growth in the three states continued to lag the nationwide rate from 2000 to 2006.² The following table illustrates the growth rates for Ohio, Pennsylvania, and West Virginia from 1990-2000 and from 2000-2006.

	Population Change 1990 to 2000 (%)	Population Change 2000 to 2006 (%)
United States average	13.1%	6.4%
Ohio	4.7%	1.1%
Pennsylvania	3.4%	1.3%
West Virginia	0.8%	0.6%

General demographic and key financial information about the institution can be found in the following tables. No impediments to meeting the credit needs of assessment areas were identified. Additional information regarding assessment area demographics can be found in tables throughout this report.

¹ Bureau of Labor Statistics, U.S. Department of Labor: www.bls.gov/lau

² U.S. Department of Agriculture, Economic Research Service: www.ers.usda.gov

Combined Demographics Report

WesBanco Bank

Analysis Year: 2005 & 2006

Assessment Group(s): Overall

Income Categories	Tract Distribution		Families by Tract Income		Families < Poverty Level as % of Families by Tract		Families by Family Income	
	#	%	#	%	#	%	#	%
Low-income	94	9.1	51,175	5.0	18,072	35.3	206,516	20.2
Moderate-income	235	22.6	179,998	17.6	27,794	15.4	185,915	18.2
Middle-income	484	46.6	518,690	50.7	38,893	7.5	225,652	22.0
Upper-income	223	21.5	273,897	26.8	7,830	2.9	405,677	39.6
Unknown-income	2	0.2	0	0.0	0	0.0	0	0.0
Total Assessment Area	1,038	100.0	1,023,760	100.0	92,589	9.0	1,023,760	100.0
	Housing Units by Tract	Housing Types by Tract						
		Owner-Occupied		Rental		Vacant		
		#	%	%	#	%	#	%
Low-income	118,147	26,255	2.5	22.2	72,872	61.7	19,020	16.1
Moderate-income	355,364	153,362	14.9	43.2	165,218	46.5	36,784	10.4
Middle-income	846,442	551,442	53.5	65.1	236,177	27.9	58,823	6.9
Upper-income	413,220	300,502	29.1	72.7	91,542	22.2	21,176	5.1
Unknown-income	0	0	0.0	0.0	0	0.0	0	0.0
Total Assessment Area	1,733,173	1,031,561	100.0	59.5	565,809	32.6	135,803	7.8
	Total Businesses by Tract		Businesses by Tract & Revenue Size					
			Less Than or = \$1 Million		Over \$1 Million		Revenue Not Reported	
			#	%	#	%	#	%
Low-income	9,469	7.6	7,719	7.1	1,490	10.7	260	9.4
Moderate-income	23,598	18.9	20,207	18.7	2,898	20.9	493	17.7
Middle-income	55,363	44.4	48,258	44.6	5,710	41.1	1,395	50.2
Upper-income	36,068	28.9	31,743	29.4	3,698	26.6	627	22.6
Unknown-income	272	0.2	170	0.2	99	0.7	3	0.1
Total Assessment Area	124,770	100.0	108,097	100.0	13,895	100.0	2,778	100.0
Percentage of Total Businesses:			86.6		11.1		2.2	
	Total Farms by Tract		Farms by Tract & Revenue Size					
			Less Than or = \$1 Million		Over \$1 Million		Revenue Not Reported	
			#	%	#	%	#	%
Low-income	13	0.6	13	0.6	0	0.0	0	0.0
Moderate-income	258	11.8	254	11.8	2	7.1	2	28.6
Middle-income	1,449	66.5	1,431	66.7	15	53.6	3	42.9
Upper-income	459	21.1	446	20.8	11	39.3	2	28.6
Unknown-income	0	0.0	0	0.0	0	0.0	0	0.0
Total Assessment Area	2,179	100.0	2,144	100.0	28	100.0	7	100.0
Percentage of Total Farms:			98.4		1.3		0.3	

Key Financial Information as of June 30, 2007	Dollar Amount (in thousands)
Total Assets	\$3,970,348
Total Deposits	\$2,997,370
Net Loans and Leases	\$2,805,079
Loans Secured by Real Estate	\$2,172,067
Loans Secured by 1 to 4 Family Residential Properties	\$1,103,718
Loans Secured by Multi-Family Residential Properties	\$121,033
Consumer Loans	\$254,206
Commercial Loans	\$346,981

Key Financial Ratios as of June 30, 2007	
Return on Average Assets	1.3%
Net Loans and Leases to Total Assets	70.7%
Investments to Total Assets	18.2%
Total Deposits to Total Assets	75.5%
Net Loans and Leases to Total Deposits	93.8%
1-4 Family Residential Loans to Average Loans	39.3%
Commercial/Agricultural Real Estate Loans to Average Loans	23.8%
Consumer Loans to Average Loans	8.9%
Commercial/Agricultural Loans to Average Loans	12.8%

The following summarizes WesBanco's assessment areas that received a full scope review. A more detailed discussion of the assessment areas selected for full scope reviews can be found in the respective sections of the report.

States of West Virginia and Ohio Multi-State Assessment Areas

- Wheeling MSA 48540, consisting of Marshall and Ohio Counties in West Virginia and Belmont County in Ohio.
- Parkersburg-Marietta MSA 37620, consisting of Pleasants, Wirt, and Wood Counties in West Virginia and Washington County in Ohio.
- Weirton-Steubenville MSA 48260, consisting of Brooke and Hancock Counties in West Virginia and Jefferson County in Ohio.

State of West Virginia

- Charleston MSA 16620, consisting of Kanawha County.
- Morgantown MSA 34060, consisting of Monongalia and Preston Counties.
- West Virginia nonmetropolitan counties consisting of Harrison, Marion, Tyler, and Wetzel Counties.

State of Ohio

- Cincinnati-Middletown MSA 17140, consisting of Hamilton County. No other counties in the Cincinnati-Middletown MSA are included in this assessment area.
- Columbus MSA 18140, consisting of Franklin County.
- Springfield MSA 44220, consisting of Clark County.
- Ohio nonmetropolitan counties consisting of Guernsey, Harrison, Monroe, and Noble Counties.

Commonwealth of Pennsylvania

- Pittsburgh MSA 38300, including portions of Washington County.

SCOPE OF EXAMINATION

All assessment areas for WesBanco were evaluated for lending, investment, and service performance. The assessment areas aforementioned were reviewed by using the full scope examination procedures. The Dayton, OH MSA 19380 and Jackson County, WV nonmetropolitan assessment areas were reviewed using the limited scope examination procedures.

The lending analysis was based on loan data from January 1, 2005 through December 31, 2006. Since WesBanco is a Home Mortgage Disclosure Act ("HMDA") reporter, mortgage loans were evaluated and categorized into the Regulation C classifications, which are home purchase, home improvement, and refinance loans. HMDA loans received more weight as they comprised 61.2% of loans while, small business and small farm loans were 38.8% of loans. In some assessment areas, it was necessary to combine the HMDA loans, as there was not enough volume to perform a meaningful analysis on each separate loan category. Small business loans were also reviewed. Small farm loans were only evaluated in the Wheeling MSA and Ohio non-metropolitan areas, as there were an insufficient number of these loans made in other assessment areas for a meaningful analysis. Bank management elected to exclude consumer loans for consideration for this evaluation.

Loans were evaluated to determine the lending activity inside and outside the bank's assessment area. In addition, loans inside the assessment area were evaluated on the geographic and borrower income distribution for each assessment area.

The bank's geographic distribution with respect to HMDA loans was assessed by comparing the percentage of loans made in each geography type (low-, moderate-, middle-, and upper-income) to the percentage of owner-occupied units in each geography type. Small business and small farm loans were compared to the percentage of businesses and farms within each geographic income category, regardless of revenue size of the business.

The bank's borrower income distribution with respect to HMDA loans was assessed by comparing the percentage of loans made to borrowers in each income category (low-, moderate-, middle-, and upper-income) to the percentage of families in each income category. Poverty level is determined by both income and family size. Generally, a larger proportion of poverty level families are in the low-income category, and to a certain extent, the moderate-income category. Borrowers at poverty level often do not qualify for real-estate loans, so the percentage of families below poverty level was considered when evaluating lending performance to low- and moderate-income borrowers.

The bank's lending performance was also compared to the 2006 aggregate performance of all lenders required to report HMDA and CRA data with the respective assessment areas. The 2006 data was not available at the beginning of the analysis process; however, it became available during the evaluation period and therefore was used throughout this review. In addition, more weight was placed on comparing WesBanco's lending performance to the aforementioned proxies derived from the demographic data. The bank's lending market share is also included in each assessment area to gain a better understanding of WesBanco's rank in each area.

Community development loans and investments funded by the bank between January 1, 2005 and December 31, 2006 were reviewed for the lending and investment tests. Community development services were evaluated for the service test.

One-third of WesBanco's offices are located in the three multistate metropolitan areas. In addition, the three multistate metropolitan areas represented 47.6% of deposits and 40.8% of loans. Within these three multistate metropolitan areas, the Wheeling MSA has the most offices (14 offices), followed by the Parkersburg-Marietta MSA (7 offices) and the Weirton-Steubenville MSA (5 offices). The percentage of deposits in the three multistate metropolitan areas was 27.3%, 9.9%, and 10.4%, respectively, while the percentage of loans was 24.7%, 10.9%, and 5.3%. Therefore, Wheeling received the greatest weight out of the three multistate metropolitan areas.

The remainder of the West Virginia has 28 offices, or 35.9%, while there are 22 offices, or 28.2%, in the state of Ohio. Further, 27.7% of deposits and 37.7% of loans were in the remainder of West Virginia, while Ohio represented 23.0% of deposits and 19.5% of loans. Therefore, the bank's performance in West Virginia was more heavily weighted than that in Ohio. Within West Virginia, the non-metropolitan area received the most weight, as 19.2% of the bank's offices, 13.5% of deposits and 17.5% of loans were located in this assessment area. Within the two West Virginia MSAs, there are seven offices in Morgantown and five in Charleston. The deposit share for the Morgantown and Charleston MSAs was 6.9% and 5.6%, while the lending share was 10.3% and 8.4%. There is only one office in the Jackson County non-metropolitan area. This county only represented 1.7% of deposits and 1.4% of loans.

The branch, deposit, and lending distributions in Ohio are as follows:

Assessment Area	Number of Offices	Deposit Share	Loan Share
Cincinnati-Middletown MSA	7	9.8%	6.1%
Columbus MSA	4	3.1%	2.6%
Dayton MSA	3	0.7%	1.1%
Springfield MSA	4	6.8%	4.2%
Ohio nonmetropolitan	4	2.7%	5.4%

Although the Cincinnati MSA is a new assessment area, it had the most offices in Ohio and therefore received the greatest weight of the assessment areas in the state.

There are only two offices in Pennsylvania with 1.7% of deposits and 1.9% of loans. While a separate state rate for Pennsylvania is required, the bank's performance in the commonwealth was not given amount a great amount of weight in WesBanco's overall performance.

CONCLUSIONS WITH RESPECT TO PERFORMANCE TESTS

Lending Test

WesBanco's performance on the lending test is "Outstanding." A majority of the bank's loans are made within its designated assessment area. Lending to tracts of different income levels is reasonably disbursed throughout the assessment area. Loans to borrowers with different income levels and to small businesses and farms are good. Community development loans have steadily increased since the prior period evaluation and have enhanced the bank's lending performance. Finally, WesBanco offers several loans programs targeted toward low- and moderate-income individuals and geographies.

Lending Activity

Lending levels reflect excellent responsiveness to credit needs throughout the assessment areas.

WesBanco ranks 23rd of 917 of HMDA reporters in its overall assessment area, which places it in the top 5% of lenders for its overall assessment area. The leading HMDA lenders in this area include Countrywide Home Loans, National City Bank, and Fifth Third Mortgage Company. The bank is ranked 18th out of 161 CRA lenders in the assessment area. The largest CRA lenders in WesBanco's assessment area are American Express Bank, FSB, Chase Bank USA, National Association, and Citibank (South Dakota), National Association.

Since the prior period, the number of HMDA loans decreased 1.8%, while the dollar amount declined 0.3%. One reason for the decrease is the general decline in refinances. As interest rates started to increase in 2004, less property owners refinanced their residences. WesBanco experienced a decrease in refinances of 53.1% since the prior period evaluation.

The raising interest rate environment has also impacted small business and small farm loans. Since the prior period evaluation, the amount of these loans has declined 3.9% and 16.4%, respectively. The dollar amount of these loans has increased by 9.1% and 17.1%, however.

Assessment Area Concentration

The table below shows the distribution of WesBanco's lending inside and outside its assessment area. A high percentage of loans are made inside its assessment area.

LENDING INSIDE AND OUTSIDE THE ASSESSMENT AREA								
JANUARY 1, 2005 – DECEMBER 31, 2006								
	Inside				Outside			
	#	%	\$(000s)	%	#	%	\$(000s)	%
HMDA home purchase	2,269	86.0	243,488	78.1	369	14.0	68,407	21.9
HMDA home improvement	1,393	94.4	31,084	82.5	82	5.6	6,575	17.5
HMDA refinancing	1,124	86.9	132,904	82.2	170	13.1	28,690	17.8
Total HMDA-related	4,786	88.5	407,476	79.7	621	11.5	103,672	20.3
Total small business	3,054	86.9	270,556	78.6	461	13.1	73,622	21.4
Total small farm	192	83.8	4,799	78.0	37	16.2	1,355	22.0
TOTAL LOANS	8,032	87.8	682,831	79.3	1,119	12.2	178,649	20.7

Geographic Distribution

The geographic distribution of loans is good, compared to excellent for the prior period evaluation. Declines were noted in lending to low- and moderate-income tracts, notably in the West Virginia nonmetropolitan assessment area and Parkersburg MSA.

Borrower Distribution

The borrower distribution of loans is good, which compares to excellent for the prior period evaluation. A smaller percentage of loans were made to low- and moderate-income borrowers and small businesses, most notably in the West Virginia nonmetropolitan area and Charleston and Morgantown MSAs.

Community Development Lending

WesBanco is a leader in making community development loans. The bank made 71 qualified community development loans totaling approximately \$92.8 million, which represents a 10.8% increase from the prior period evaluation. Substantial increases were noted in the Morgantown, Wheeling, nonmetropolitan West Virginia, and Parkersburg-Marietta assessment areas, with declines in Springfield, Charleston, Weirton-Steubenville, and Pittsburgh.

The bank made at least one community development loan in each of its assessment areas, which is notable, as there were less assessment areas during the prior period and no loans were made in two areas (Columbus and the Ohio nonmetropolitan area). While most of the loans were for organizations that provide services to low- and moderate-income individuals, loans were also originated to provide affordable housing for low- and moderate-income individuals, economic development, and to revitalize and stabilize low, moderate- and distressed middle-income tracts.

The bank's overall lending performance was enhanced through the use of community development loans.

Innovative or Flexible Lending Criteria

WesBanco offers several loans programs that address the needs of low- and moderate-income individuals or low- and moderate-income geographies. These programs, which are listed below, were considered in evaluating the bank's flexible lending practices to address credit needs for these individuals and geographies.

- *State Bond Programs – West Virginia Housing Development Fund and Ohio Housing Finance Agency* – In 2005, the bank's product offerings through the Ohio Housing Finance Agency were expanded to include Fannie Mae products. Special features of these products include reduced private mortgage insurance and down payment and closing cost assistance. Also, in that year, the West Virginia Housing Development Fund ("WVHDF") introduced private mortgage insurance that has the benefit of providing payment protection due to unemployment. The WVDHF also began to offer financing for new and used manufactured homes.
- *First Front Door Program, Federal Home Loan Bank of Pittsburgh* – Borrowers can receive matching funds from the Federal Home Loan Bank of Pittsburgh to obtain closing cost assistance. This program has been introduced in Ohio since the previous evaluation.
- *Freedom Mortgage* – This program is targeted to low- and moderate-income borrowers and provides flexible underwriting standards. Recipients can receive down payment and closing cost assistance from several community partners.
- *Freedom Home Modernization and Freedom Auto Loan* – The bank offers home improvement loan and automobile loans specifically targeting low- and moderate-income individuals.
- *Partnership with Federation of Appalachian Housing Enterprises, Inc. ("FAHE")* – The bank partnered with the agency in to offer a 25+ mortgage product. The bank entered into a partnership with FAHE to provide affordable housing in Charleston, Parkersburg, Fairmont, Clarksburg, Morgantown, and Wheeling. The Freedom Mortgage product is then used as a second mortgage,

WesBanco also offers 100% financing and other options available for borrowers who have difficulty in obtaining funds for down payments are 97% loans and lender-paid mortgage insurance. The bank participates in the USDA Leveraged Loan program to serve rural markets. Further, WesBanco offers products targeted toward manufactured homes.

Investment Test

WesBanco's performance under the investment test is "Outstanding." Current period investments include investments in mortgage-backed securities that target low- and moderate-income individuals or properties in low- or moderate-income tracts and bonds, equities, and low-income housing tax credits that promote affordable housing. Most of the new investments are allocated to the various assessment areas using each area's deposit share; however, three of them were for specific areas, namely two in Cincinnati and one in Columbus. New investments totaled approximately \$8 million for this evaluation period.

WesBanco also had a number of investments made in prior years that had unamortized balances as of December 31, 2006. Prior period investments also consist of bonds, low-income housing tax credits, equities, and mortgage-backed securities. As of year-end 2006, prior period investments totaled approximately \$30.9 million.

As of year-end 2006, the total of current and prior period investments was approximately \$38.9 million, which is an increase of 8.5% since the prior period evaluation. In addition, since the bank performed satisfactorily, an investment with an unamortized balance of \$494,566 made outside of the assessment area was also included as qualified investment.

In addition, the bank made 166 donations totaling \$338,820 to various community development organizations. Again, most were for organizations that provide services to low- and moderate-income individuals; however, there were also donations for the purposes of affordable housing, economic development, and to revitalize and stabilize low-, moderate- and distressed middle-income tracts.

Service Test

WesBanco's performance under the service test is "Outstanding."

Retail Services

Retail delivery systems are accessible to the bank's geographies and individuals of different income levels in its assessment areas. WesBanco's record of opening and closing of branches has not adversely affected the accessibility of its delivery systems, particularly to low- and moderate-income individuals and/or geographies. Services do not vary in a way that inconveniences its assessment area, particularly low- and moderate-income geographies and/or individuals.

WesBanco has 78 offices, 35 full service ATMs, and 73 cash-only ATMs within its assessment areas. This evaluation compared the percentage of banking center locations by tract income against the income tract distribution and by the percentage of families in each tract. The following table illustrates WesBanco's overall branch and full service ATM distribution compared to the income tract distribution and percentage of families in each tract.

Tract Category	Tract Distribution (%)	Percentage of Families by Tract	Percentage of Branches	Percentage of Full Service ATMs
Low	9.1	5.0	2.6	2.9
Moderate	22.6	17.6	16.7	17.1
Middle	46.6	50.7	56.4	45.7
Upper	21.5	26.8	24.4	34.3

Since the prior period evaluation, four offices have been closed, while one has been opened. Further, there have been four relocations. Finally, four offices in Ritchie County were sold to another financial institution.

Alternative delivery systems include WesBancoLine, the bank's telephone banking service. Customers can access checking, savings, and certificate of deposit information. Funds can be transferred between checking and savings accounts and also to make loan payments. Customers can also report ATM or credit cards as lost or stolen. WesBancoNet is the bank's online service. Customers are able to access deposit and loan account information. Funds can be transferred between accounts and checks can be ordered. Access to internet banking is free through the bank's "Free Checking" account. Bill payment is available via internet banking. WesBanco has also donated several computers to non-profit organizations to facilitate access to low- and moderate-income persons.

Further, the bank provides Bank-By-Mail envelopes at no cost to customers and employees visit customers at home to perform services such as reviewing product options, balancing statements, and providing notary services.

The Community Development Department provides local businesses and non-profit organizations with information about the bank's products and services, specifically those targeted for low- and moderate-income individuals. Bank personnel provide product information, and brochures about the Freedom Mortgages, Freedom Home Modernization Loans, and Freedom Auto Loan programs.

Community Development Services

WesBanco is a leader in making community development services. The bank made 500 services to 245 unique community development organizations. Many of the community development services for the prior period evaluation were to educate low- and moderate- students about the basics of banking. During this evaluation, these still occurred; however, a greater variety of services was noted, including organizations that promote affordable housing, economic development, revitalization and stabilization, and services for other low- and moderate-income individuals, including for medical and job-related services.

FAIR LENDING OR OTHER ILLEGAL CREDIT PRACTICES REVIEW

No violations of the substantive provisions of the antidiscrimination laws and regulations were noted. The bank continues the use of fair lending policies and procedures and has an effective fair lending training program to address fair lending issues. Internal reviews of bank policies and procedures are conducted routinely to ensure compliance

MULTISTATE METROPOLITAN AREA

CRA RATING FOR: Wheeling, WV-OH MSA:³ Outstanding

The Lending Test is rated: Outstanding

The Investment Test is rated: Outstanding

The Service Test is rated: Outstanding

Major factors supporting the institution's rating include:

- Lending levels reflect excellent responsiveness to assessment area credit needs;
- The geographic distribution of loans reflects good penetration throughout the assessment areas;
- The distribution of borrowers reflects, given the product lines offered, excellent penetration among customers of different income levels and businesses of different sizes;
- The bank is a leader in making community development loans;
- The bank has an excellent level of qualified community development investments and grants, often in a leadership position;
- Delivery systems are readily accessible to all portions of the bank's assessment areas.
- The record of opening and closing of branches has not adversely affected the accessibility of its delivery systems, particularly low- and moderate-income geographies and/or low- or moderate-income individuals; and,
- A leader in providing community development services.

SCOPE OF EXAMINATION

The scope of the examination for the Wheeling MSA is consistent with the scope of the examination for the institution. This assessment area received a full scope review.

DESCRIPTION OF INSTITUTION'S OPERATIONS IN THE WHEELING, WEST VIRGINIA-OHIO MSA

The Wheeling multistate assessment area represented WesBanco's largest market by percentage of deposits, with 27.3% of total deposits and 24.7% of loans. Fourteen offices, including the main office in downtown Wheeling, five full service ATMs, and sixteen cash-only ATMs are in this assessment area.

³ 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 within the multistate metropolitan area.

This assessment area consists of the entirety of the Wheeling, WV-OH MSA, which includes Ohio and Marshall Counties in West Virginia's panhandle and Belmont County in southeastern Ohio. The assessment area is comprised of 49 tracts: 2 low-, 12 moderate-, 25 middle-, and 10 upper-income tracts. The low- and moderate-income geographies are concentrated along the Ohio River.

As of June 30, 2006, WesBanco ranked first out of 14 institutions in the Wheeling, WV-OH multistate metropolitan area with 32.5% of total deposits.⁴ Other institutions having greater than 10% of the market share in this MSA include United Bank, which is headquartered in Parkersburg, and Sky Bank.

Two community contacts were made to local organizations as part of this evaluation. The first contact was to local government organization in St. Clairsville that promotes development of the city, specifically the downtown area. The contact indicated that financial institutions have helped to redevelop the area. The contact indicated that further financing could be obtained, especially to rehabilitate a former hotel building in the area. The other contact was from a business development organization in Wheeling. This contact also noted that financial institutions in the area are active in the organization. They felt that area financial institutions could improve their efforts to educate the general public about banking products in general. During this evaluation period, WesBanco continued to provide several financial literacy sessions, both to schools and to other community organizations.

Population Characteristics

The population within this assessment area as of the 2000 census was 153,172. Population growth in the three counties within the assessment area was as follows:⁵

County Name, State	Population Change 1990 to 2000 (%)	Population Change 2000 to 2006 (%)
Belmont County, Ohio	-1.2	-2.1
Marshall County, West Virginia	-4.9	-4.6
Ohio County, West Virginia	-6.8	-5.8

The population is primarily White non-Hispanic at 95.3%, with Black non-Hispanic the largest minority group at 3.1%. Of the total population, 21.9% were age 17 years and younger, 8.5% were age 18 to 24 years, 51.7% were age 25 to 64 years, and 17.9% were age 65 and over.

⁴ FDIC Summary of Deposits: www.fdic.gov

⁵ USDA Economic Research: www.ers.usda.gov

Income Characteristics

The median family income for Wheeling multistate metropolitan area was \$38,855, which was higher than the State of West Virginia's median family income of \$36,484, but lower than the State of Ohio's median family income of \$50,037. Families comprised 67.0% of the households in the assessment area. Approximately 11.8% of the families lived below the poverty level, which was between the poverty level for the State of West Virginia of 13.9% and State of Ohio at 7.8%. Of the families living in the assessment area, 19.8% were low-income families, 18.6% were moderate-income families, 21.9% were middle-income families, and 39.7% were upper-income families.

Housing Characteristics

As of the 2000 census, there were 69,216 housing units in the Wheeling MSA, of which 66.2% were owner-occupied. The majority of the units (83.8%) housed 1-4 families, while 8.4% housed 5 families or more, and 7.7% were mobile homes. Over 31.1% of the units in the low-income geographies were vacant, while 42.8% were rental units. The vacancy rate was lower in the moderate-income tracts at 16.3%; however, it was still higher than West Virginia and Ohio's overall vacancy rates of 12.8% and 7.1%. The median age of the housing stock was 48 years, which was significantly higher than the rate for the States of West Virginia and Ohio at 31 and 38 years, respectively.

Labor, Employment, and Economic Characteristics

According to the Bureau of Labor Statistics of the U.S. Department of Labor,⁶ the 2006 annual average unemployment rate for the Wheeling MSA was 5.5%, which was higher than the nationwide average of 4.6% and ranked it 282nd out of 369 MSAs in the country. The rate matched Ohio's average of 5.5% and was higher than West Virginia's average rate of 4.9%. The unemployment rates for the three counties in the assessment area were as follows:

Belmont County, Ohio	5.9%
Marshall County, West Virginia	5.7%
Ohio County, West Virginia	4.8%

⁶ www.bls.gov/lau

A major employer in this assessment area is Wheeling Pittsburgh Steel Corporation, which employs approximately 4,000 people in the area. CONSOL Coal Group operates a mine in Moundsville, which is in Marshall County, while Ohio Valley Coal has a mine in Belmont County. Wheeling Jesuit University and the National Technology Transfer Center have partnered to provide access for private business and industry to government research laboratories.⁷ Other major employers in Marshall County include Bayer Polymers, Mcelroy Coal Company, PPG Industries, and Reynolds Memorial Hospital. Large employers in Ohio County include the City of Wheeling, Ohio Valley Medical Center, and Wheeling Downs Association, Inc. The bank itself is a major employer in this county.⁸ Other major employers in Belmont County include several health centers, such as Barnesville Hospital Association, Belmont Community Hospital, and East Ohio Regional Hospital.⁹

Key demographic information about this assessment area is on the following page.

⁷ Wheeling Area Chamber of Commerce: www.wheelingchamber.com

⁸ Regional Conditions from the Federal Reserve Bank of Richmond: www.richmondfed.org

⁹ Ohio County Profiles of the Office of Strategic Research, Ohio Department of Development:
<http://www.odod.state.oh.us/research/>

Combined Demographics Report

WesBanco Bank

Analysis Year: 2005 & 2006

Assessment Area(s): Wheeling WV-OH MSA 48540

Income Categories	Tract Distribution		Families by Tract Income		Families < Poverty Level as % of Families by Tract		Families by Family Income	
	#	%	#	%	#	%	#	%
Low-income	2	4.1	469	1.1	208	44.3	8,279	19.8
Moderate-income	12	24.5	4,765	11.4	956	20.1	7,767	18.6
Middle-income	25	51.0	28,236	67.6	3,243	11.5	9,164	21.9
Upper-income	10	20.4	8,311	19.9	528	6.4	16,571	39.7
Unknown-income	0	0.0	0	0.0	0	0.0	0	0.0
Total Assessment Area	49	100.0	41,781	100.0	4,935	11.8	41,781	100.0
	Housing Units by Tract	Housing Types by Tract						
		Owner-Occupied			Rental		Vacant	
		#	%	%	#	%	#	%
Low-income	1,365	356	0.8	26.1	584	42.8	425	31.1
Moderate-income	10,312	4,516	9.9	43.8	4,119	39.9	1,677	16.3
Middle-income	44,126	31,536	68.9	71.5	8,728	19.8	3,862	8.8
Upper-income	13,413	9,381	20.5	69.9	3,029	22.6	1,003	7.5
Unknown-income	0	0	0.0	0.0	0	0.0	0	0.0
Total Assessment Area	69,216	45,789	100.0	66.2	16,460	23.8	6,967	10.1
	Total Businesses by Tract	Businesses by Tract & Revenue Size						
		Less Than or = \$1 Million		Over \$1 Million		Revenue Not Reported		
		#	%	#	%	#	%	#
Low-income	146	3.1	117	2.8	26	6.0	3	1.9
Moderate-income	1,153	24.3	977	23.5	142	32.8	34	22.1
Middle-income	2,578	54.3	2,282	54.8	202	46.7	94	61.0
Upper-income	873	18.4	787	18.9	63	14.5	23	14.9
Unknown-income	0	0.0	0	0.0	0	0.0	0	0.0
Total Assessment Area	4,750	100.0	4,163	100.0	433	100.0	154	100.0
Percentage of Total Businesses:			87.6		9.1		3.2	
	Total Farms by Tract	Farms by Tract & Revenue Size						
		Less Than or = \$1 Million		Over \$1 Million		Revenue Not Reported		
		#	%	#	%	#	%	#
Low-income	1	0.6	1	0.6	0	0.0	0	0.0
Moderate-income	2	1.1	2	1.1	0	0.0	0	0.0
Middle-income	170	96.6	168	96.6	2	100.0	0	0.0
Upper-income	3	1.7	3	1.7	0	0.0	0	0.0
Unknown-income	0	0.0	0	0.0	0	0.0	0	0.0
Total Assessment Area	176	100.0	174	100.0	2	100.0	0	0.0
Percentage of Total Farms:			98.9		1.1		0.0	

CONCLUSIONS WITH RESPECT TO PERFORMANCE TESTS IN THE WHEELING, WEST VIRGINIA-OHIO MSA

Lending Test

WesBanco's performance on the lending test is for this assessment area is "Outstanding." Loans continue to be reasonably distributed among the different census tracts, especially to low- and moderate-income areas. Lending to low- and moderate-income borrowers and to small businesses and farms improved and is now excellent. Community development loans enhanced the bank's performance.

Lending Activity

Lending levels reflect excellent responsiveness to credit needs throughout this assessment area given that this WesBanco's largest market by deposit and loan share.

Approximately \$133.2 million in loans were made in Wheeling MSA in the evaluation period, which represented 24.7% of WesBanco's lending activity. The percentage of loans exceeds the percentage of deposits from this assessment area, but is less than the percentage of offices. WesBanco ranked first of 213 institutions in HMDA lending and fourth of 39 banks for CRA lending.

Geographic Distribution

The geographic distribution of loans is good, which is the same as the previous evaluation period. HMDA lending is good, while small loans to businesses and farms are excellent.

There were no significant lending gaps in this assessment area. No HMDA lending took place in 1 (8.3%) of 12 moderate-income tracts; however, a relatively large percentage of units were vacant (16.5%) in this geography and only 42.6% of the units were owner-occupied. There was also no CRA lending in the same moderate-income tract.

Home Purchase Loans

WesBanco made 1.9% of its home purchase loans in low-income tracts, which was greater than the percentage of owner-occupied units located in these tracts at 0.8%. The aggregate of all HMDA lenders made 0.3% of their home purchase loans in low-income geographies, which was lower than the bank's figure. Therefore, the geographic distribution of home purchase loans to low-income tracts is excellent.

The bank originated 7.1% of its home purchase loans in moderate-income tracts, which was less than the percentage of owner-occupied units in these tracts at 9.9%. The aggregate of all HMDA lenders made 11.0% of their home purchase loans in moderate-income tracts, which was higher than the bank's percentage. Thus, the geographic distribution of home purchase loans to moderate-income tracts is adequate.

WesBanco made 61.1% and 29.9% of its home purchase loans in middle- and upper-income tracts, respectively, compared to the percentage of owner-occupied units in these tracts at 68.9% and 20.5%. The aggregate of all HMDA lenders made 62.2% and 26.5% of their loans in middle- and upper-income tracts, respectively.

Refinance Loans

WesBanco made 0.8% of its refinance loans in low-income tracts, which was the same as the percentage of owner-occupied units in these tracts. The bank surpassed the aggregate of all HMDA lenders in these low-income tracts, which made 0.2% of their refinance loans in low-income tracts. Thus, the geographic distribution of refinance loans to low-income geographies is good.

The bank originated 8.8% of its refinance loans in moderate-income geographies, which was less than the percentage of owner-occupied units in these tracts at 9.9% and the percentage of loans made by the aggregate of all HMDA lenders in these geographies at 10.2%. Therefore, the geographic distribution of refinance loans to moderate-income tracts is good.

The bank made 63.8% and 26.7% of its refinance loans in middle- and upper-income geographies, respectively, compared to the percentage of owner-occupied units in these geographies at 68.9% and 20.5%. The aggregate of all HMDA lenders made 65.5% and 23.9% of their loans in the middle- and upper-income tracts.

Home Improvement Loans

WesBanco originated 1.5% of its home improvement loans in low-income tracts, which exceeded the percentage of owner-occupied units in these tracts at 0.8% and the percentage of HMDA lenders' loans in these tracts at 0.3%. Therefore, the geographic distribution of home improvement loans to low-income tracts is excellent.

The bank made 11.9% of its home improvement loans in moderate-income tracts, which was greater than the percentage of owner-occupied units in these tracts at 9.9%. The aggregate of all HMDA lenders made more home improvement loans in the moderate-income tracts at 13.2%. Thus, the geographic distribution of refinance loans is excellent.

WesBanco made 70.4% and 16.1% of its home improvement loans in middle- and upper-income tracts, respectively, compared to the percentage of owner-occupied units in these geographies at 68.9% and 20.5%. The aggregate of all HMDA lenders made 65.5% and 21.1% of their home improvement loans in the middle- and upper-income tracts.

Small Business Loans

The bank made 6.7% of its small loans to businesses in low-income tracts, which exceeded the percentage of businesses in these tracts at 3.1% and the aggregate of all CRA lenders who made 2.8% of their loans in these tracts. Therefore, the geographic distribution of small loans to businesses in low-moderate tracts is excellent.

WesBanco originated 22.0% of its small loans to businesses in moderate-income tracts, which was less than the percentage of businesses in these geographies of 24.3%. The aggregate of all CRA lenders made fewer loans in these tracts at 18.6%. Thus, the geographic distribution of small loans to businesses in moderate-income tracts is good.

The bank made 47.0% and 24.3% of its small loans to businesses in middle- and upper-income tracts, respectively, compared to the percentage of businesses in these geographies at 54.3% and 18.4%. The aggregate of all CRA lenders made 50.6% and 24.4% of their small loans to businesses in the middle- and upper-income tracts.

Small Farm Loans

The bank did not make any small loans to farms in the low-income tracts. The aggregate of all CRA lenders did not make any loans in these geographies either and only 0.6% of the farms are in the low-income tracts. Thus, the geographic distribution of small loans to farms in low-income tracts is adequate.

WesBanco originated 3.6% of its small loans to farms in the moderate-income tracts, which surpassed the percentage of farms in these tracts at 1.1%. The aggregate of all CRA lenders did not make any small loans to farms in these tracts. Therefore, the geographic distribution of small loans to farms in moderate-income tracts is excellent.

WesBanco made 89.1% and 7.3% of its small loans to farms in the middle- and upper-income tracts, respectively, which is compared to the percentage of farms in these tracts at 96.6% and 1.7%. The aggregate of all CRA lenders made 74.9% and 19.7% of their small loans to farms in the middle- and upper-income tracts.

Distribution by Borrower Income and Revenue Size of the Business and the Farm

The borrower distribution of loans is excellent, compared to good at the prior evaluation period. The percentage of loans made to low-income borrowers increased since the prior evaluation and the bank consistently made more loans to these borrowers than its competitors. The borrower distribution for HMDA, small business, and small farm loans are all excellent.

Home Purchase Loans

WesBanco made 16.5% of its home purchase loans to low-income borrowers, which was lower than the percentage of low-income families at 19.8%. The aggregate of all HMDA lenders made fewer loans to low-income borrowers at 11.3%. Therefore, the borrower distribution of home purchase loans to low-income borrowers is excellent given the poverty level of 11.8% and that the bank's percentage of loans to low-income borrowers substantially exceeded the percentage of loans made by the aggregate of all HMDA lenders in the assessment area.

The bank originated 21.4% of its home purchase loans to moderate-income borrowers, which was more than percentage of moderate-income families at 18.6% and the percentage of loans made by the aggregate of all HMDA lenders to moderate-income borrowers at 21.2%. Thus, the borrower distribution of home purchase loans to moderate-income borrowers is excellent.

WesBanco made 17.1% and 36.3% of its home purchase loans to middle- and upper-income borrowers, respectively, compared to the percentage of middle- and upper-income families at 21.9% and 39.7%. The aggregate of all HMDA lenders made 22.3% and 32.8% of their loans to middle- and upper-income borrowers. The borrowers' income was unknown for 8.8% of the home purchase loans originated in this assessment area.

Refinance Loans

The bank originated 12.1% of its refinance loans to low-income borrowers, which was less than the percentage of low-income families at 19.8%. The aggregate of all HMDA lenders made fewer loans to low-income borrowers at 6.6%. Thus, the borrower distribution of refinance loans to low-income borrowers is good given the high poverty rate of 11.8% and because the bank exceeded the percentage of loans made by the aggregate of all HMDA lenders.

The bank made 17.9% of its refinance loans to moderate-income borrowers, which was less than the percentage of moderate-income families at 18.6%. The aggregate of all HMDA lenders made fewer refinance loans to moderate-income borrowers at 17.7%. Therefore, the borrower distribution of refinance loans to moderate-income borrowers is good.

WesBanco originated 22.9% and 40.4% of its refinance loans to middle- and upper-income borrowers, respectively, compared to the percentage of middle- and upper-income families at 21.9% and 39.7%. The aggregate of all HMDA lenders made 23.8% and 36.1% of their refinance loans to middle- and upper-income borrowers. The borrowers' income was unknown for 6.7% of the refinance loans made in this assessment area.

Home Improvement Loans

WesBanco made 31.9% of its home improvement loans to low-income borrowers, which exceeded the percentage of low-income families at 19.8% and the aggregate of all HMDA reporters who made 15.2% of their loans to low-income borrowers. Therefore, the borrower distribution of home improvement loans to low-income borrowers is excellent.

The bank originated 43.6% of its home improvement loans to moderate-income borrowers, which surpassed the percentage of moderate-income families at 18.6% and the percentage of loans made by the aggregate of all HMDA lenders to moderate-income borrowers at 19.6%. Therefore, the borrower distribution of home improvements loans to moderate-income borrowers is excellent.

The bank originated 8.4% and 11.0% of its home improvement loans to middle- and upper-income borrowers, respectively, compared to the percentage of middle- and upper-income families at 21.9% and 39.7%. The aggregate of all HMDA lenders made 24.5% and 38.0% of their home improvement loans to middle- and upper-income borrowers. The borrowers' income was unknown for 5.1% of the refinance loans made in this assessment area.

Small Business Loans

WesBanco made 72.1% of its small loans to businesses to small businesses, which was less than the percentage of small businesses in the assessment area at 87.6%, but more than the aggregate of all CRA reporters' loans to small businesses at 33.8%. Thus, the borrower distribution of loans to small businesses is excellent given that bank's percentage of loans greatly exceeded the percentage of loans made by other borrowers.

Small Farm Loans

The bank made all of its small loans to farms to small farms, which exceeded the percentage of small farms at 98.9% and the percentage of the aggregate of all CRA reporters' loans to small farms at 93.8%. Therefore, the borrower distribution of loans to small farms is excellent.

Community Development Lending

The bank is a leader in making community development loans in the Wheeling multistate metropolitan area. During the evaluation period, the bank made 20 community development loans totaling approximately \$58.7 million. Two loans were made to foster affordable housing, ten provided financial services to low- and moderate-income individuals, five were for economic development, and three were made to revitalize and/or stabilize low- and moderate-income tracts. The highest number of community development loans, both by dollar amount and by volume, was made in this assessment area (28.2% by volume and 63.2% by dollar amount). Community development loans increased 27.5% since the prior period evaluation.

Investment Test

WesBanco's performance under the investment test is "Outstanding." The five new investments totaling \$1,211,669 represent the assessment area's share of three mortgage-backed securities and two equity investments in affordable housing loan funds. There were also 30 investments made in prior periods with outstanding balances. These unamortized balances totaled \$8,967,666 as of December 31, 2006.

Thirty donations equaling \$64,364 were also made to various community development groups in 2005 and 2006.

Service Test

WesBanco's performance under the service test is "Outstanding."

Retail Services

Retail delivery systems are readily accessible to the bank's geographies and individuals of different income levels in its assessment areas. WesBanco's record of opening and closing of branches has not adversely affected the accessibility of its delivery systems, particularly to low- and moderate-income individuals and/or geographies. Services do not vary in a way that inconveniences its assessment area, particularly low- and moderate-income geographies and/or individuals.

WesBanco's main office and its accompanying cash-only ATM are located in a low-income tract. One branch with a cash-only ATM, one branch without an ATM, one full service ATM, and seven cash-only ATMs are in moderate-income geographies. The majority of the offices are in middle-income tracts, where there are six branches without ATMs, two branches with full service ATMs, one branch with a cash-only ATM, and five stand-alone cash-only ATMs. In the upper-income tracts, there is one branch without an ATM, one branch with an ATM, and one cash-only ATM. The following table illustrates the distribution of WesBanco's offices and full service ATMs compared to the income tract distribution and percentage of families in each tract.

Tract Category	Tract Distribution (%)	Percentage of Families by Tract	Percentage of Branches	Percentage of Full Service ATMs
Low	4.1	1.1	7.1	20.0
Moderate	24.5	11.4	14.3	20.0
Middle	51.0	67.6	64.3	40.0
Upper	20.4	19.9	14.3	20.0

In April 2005, an office in North Benwood, West Virginia was closed. The branch had temporarily closed in September 2004 due to flooding in the area. The decision was made to permanently close the branch in April. The office was located in a moderate-income tract. The closing of this office did not negatively impact banking services, as three other WesBanco offices were within four miles of the closed branch. In September 2006, WesBanco consolidated its three Barnesville, Ohio offices into a new building, which was established on the site of one of the former offices. The two offices that were closed were in middle-income tracts and the new office is the middle-income tract. This consolidation also did not negatively impact banking services, as the three existing offices were in the same census tract and the consolidation was a result of building an improved facility for customers in the Barnesville area.

Community Development Services

The bank is a leader in making community development services. Examples of these services include:

- *Belmont County Business Incubator* – An employee advised the board of directors of this organization, which provides services for start-up companies.
- *Belomar Regional Council Housing Authority* – This organization provided funds for flood relief projects in Belmont County, which was designated as a flood disaster area in 2004. A bank employee is the vice chairman of the board of directors.
- *Change, Inc. of Moundsville* – One employee is a member of the economic development committee and another is on the board of directors of this organization, which provides services to low- and moderate-income individuals.
- *East Wheeling Business Council* – A bank employee is on the board of this organization, which promotes development in East Wheeling, which is located in a low-income tract.
- *Hopeful Housing, Inc.* – This organization builds housing for low- and moderate-income individuals. Several employees hold roles in this organization, including one acting as both treasurer and president and one on the board of directors. An employee also wrote a grant for the organization and collected surveys to help low- and moderate-income borrowers purchase homes.
- *Laughlin Memorial Trust* – This trust is administered by the bank and was established by a local businessman in the early 20th century. The trust provides interest-free loans for home financing and is targeted to low- and moderate-income borrowers. A bank employee processes applications for the trust and provided financial literacy training to applicants.
- *North Earned Income Tax Credit Coalition* – Bank employees provided training on earned-income tax credits and helped to prepare a building grant for this organization, which provides information to low- and moderate-income individuals about the earned-income tax credit.
- *Ohio Valley Industrial and Business Development Corporation (also known as Regional Economic Development Partnership)* – A bank employee is president and member of the executive committee, which provides loans and lines of credit to small businesses.

- *Wheeling Saves* – This organization promotes savings for low- and moderate-income Wheeling residents. Bank employees are on the finance committee, the financial products and services committee, and the fund raising committees. Bank personnel also wrote grants for the organization and presented material about savings directly to low- and moderate-income individuals.

MULTISTATE METROPOLITAN AREA

CRA RATING FOR: Parkersburg-Marietta, WV-OH MSA:¹⁰ Outstanding

The Lending Test is rated: Outstanding

The Investment Test is rated: Outstanding

The Service Test is rated: Outstanding

Major factors supporting the institution's rating include:

- Lending levels reflect excellent responsiveness to assessment area credit needs;
- The geographic distribution of loans reflects good penetration throughout the assessment areas;
- The distribution of borrowers reflects, given the product lines offered, excellent penetration among customers of different income levels and businesses of different sizes;
- The bank is a leader in making community development loans;
- The bank has an excellent level of qualified community development investments and grants, often in a leadership position;
- Delivery systems are readily accessible to all portions of the bank's assessment areas.
- The record of opening and closing of branches has not adversely affected the accessibility of its delivery systems, particularly low- and moderate-income geographies and/or low- or moderate-income individuals; and,
- A leader in providing community development services.

SCOPE OF EXAMINATION

The scope of the examination for the Parkersburg-Marietta MSA is consistent with the scope of the examination for the institution. This assessment area received a full scope review.

DESCRIPTION OF INSTITUTION'S OPERATIONS IN THE PARKERSBURG-MARIETTA WEST VIRGINIA-OHIO MSA

The Parkersburg-Marietta multistate assessment area represented 9.9% of WesBanco's deposits and 10.9% of loans. Seven offices, two full service ATMs, and seven cash-only ATMs are located in this assessment area.

¹⁰ 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 within the multistate metropolitan area.

The entire Parkersburg-Marietta, WV-OH MSA is contained in this assessment area, which includes Pleasants, Wirt, and Wood Counties in northwestern West Virginia and Washington County in southeastern Ohio. The assessment area consists of 46 tracts: 8 moderate-, 32 middle-and 6 upper-income tracts. The moderate-income tracts are located in the cities of Parkersburg, West Virginia, and Marietta, Ohio.

As of June 30, 2006, WesBanco ranked third out of 24 institutions in the Parkersburg-Marietta, WV-OH multistate metropolitan area with 11.6% of total deposits.¹¹ Other institutions having greater than 10% of the market share in this MSA included United Bank, which is headquartered in Parkersburg, and Peoples Bank, N.A., which is headquartered in Marietta.

A community contact was made to a governmental housing agency that serves several counties in the western portion of West Virginia, including Pleasants, Wirt, and Wood County. The contact indicated that there is a shortage of affordable housing stock in the area because the existing stock does not meet quality standards and needs to be significantly improved to be habitable. Further, new stock is not being built. The contact also indicated WesBanco has been helpful through the CHIP program; however, they expressed some concern that loan decisions are no longer being made locally, but rather in Wheeling.

Population Characteristics

As of the 2000 census, the population within this assessment area totaled 164,624. The following table represents population growth in the four counties in this assessment area from 1990 to 2000 and from 2000 to 2006:¹²

County Name, State	Population Change 1990 to 2000 (%)	Population Change 2000 to 2006 (%)
Washington County, Ohio	1.6	-2.2
Pleasants County, West Virginia	-0.4	-3.1
Wirt County, West Virginia	13.1	1.8
Wood County, West Virginia	1.2	-1.6

The population is mostly White non-Hispanic at 97.0%, with Black non-Hispanic the largest minority group at 1.1%. Of the total population, 23.3% were age 17 years and younger, 8.3% were age 18 to 24 years, 53.2% were age 25 to 64 years, and 15.2% were age 65 and over.

¹¹ FDIC Summary of Deposits: www.fdic.gov

¹² USDA Economic Research: www.ers.usda.gov

Income Characteristics

The median family income for the Parkersburg-Marietta MSA was \$40,320, which was higher than the State of West Virginia's median family income of \$36,484, but lower than the State of Ohio's median family income of \$50,037. Families comprised 70.0% of the households in the assessment area. The poverty level for the Parkersburg-Marietta multistate area was 10.1%, which was between the poverty level for West Virginia of 13.9% and for Ohio at 7.8%. Of the families living in the assessment area, 18.8% were low-income families, 19.0% were moderate-income families, 22.4% were middle-income families, and 39.8% were upper-income families.

Housing Characteristics

There were 74,025 housing units in the Parkersburg-Marietta MSA as of the 2000 census. A majority of the units (67.6%) were owner-occupied. Housing for 1-4 families comprised 80.3% of the units, while multi-family units and mobile homes represented 6.7% and 12.6% of the housing, respectively. The median age of the housing stock was 35 years, which was younger than the State of Ohio's rate of 38 years, but older than the State of West Virginia's rate of 31 years.

Labor, Employment, and Economic Characteristics

The 2006 annual average employment rate for the Parkersburg-Marietta MSA was 5.1%, which exceeded the nationwide average of 4.6% and ranked the multistate area 250th of 369 MSAs in the country.¹³ The average was between Ohio's rate of 5.5% and West Virginia's rate of 4.9%. The unemployment rates for the four counties in the assessment area were as follows:

Washington County, Ohio	5.3%
Pleasants County, West Virginia	5.6%
Wirt County, West Virginia	6.1%
Wood County, West Virginia	4.9%

Chemical plants, including DuPont and GE Plastics, employ a large number of people in the Parkersburg area. Other major employers in Parkersburg include Ames Company, which manufactures shovels and garden and farm tools, and Dover Parkersburg, a manufacturer of furnace pipers and structural steel items. Walker Systems, which makes pre-engineered metal buildings, and Fenton Arm Glass are both located in Williamstown.¹⁴

¹³ www.bls.gov/lau

¹⁴ Chamber of Commerce of the Mid-Ohio Valley: www.parkersburgchamber.com

Employers in Pleasants County include Alpharma, Inc., a pharmaceutical company, American Boiler & Chimney Company, Cytec Industries, Inc., a chemical company, and Pioneer Pipe, Inc. Major employers in Wirt County are Little Kanawha Nursery, Mustang Survival Manufacturing, Inc., a manufacturer of protective clothing, and West Virginia Department of Highways. Other employers in Wood County include Camden-Clark Memorial Hospital and Coldwater Creek, Inc.¹⁵

Major employers in Washington County, Ohio include Alliance Industries, which manufactures a variety of goods, including vacuums and Eramet Marietta, Inc., which manufactures manganese alloys. Other employers are Krayton Polymers, Marietta College, and Marietta Memorial Hospital.¹⁶

Key demographic information about the assessment area is on the following page.

¹⁵ Regional Conditions from the Federal Reserve Bank of Richmond: www.richmondfed.org

¹⁶ Ohio County Profiles of the Office of Strategic Research, Ohio Department of Development: <http://www.odod.state.oh.us/research/>

Combined Demographics Report

WesBanco Bank

Analysis Year: 2005 & 2006

Assessment Area(s): Parkersburg-Marietta WV-OH MSA 37620

Income Categories	Tract Distribution		Families by Tract Income		Families < Poverty Level as % of Families by Tract		Families by Family Income	
	#	%	#	%	#	%	#	%
Low-income	0	0.0	0	0.0	0	0.0	8,782	18.8
Moderate-income	8	17.4	4,456	9.6	900	20.2	8,876	19.0
Middle-income	32	69.6	36,578	78.4	3,563	9.7	10,432	22.4
Upper-income	6	13.0	5,606	12.0	241	4.3	18,550	39.8
Unknown-income	0	0.0	0	0.0	0	0.0	0	0.0
Total Assessment Area	46	100.0	46,640	100.0	4,704	10.1	46,640	100.0
	Housing Units by Tract	Housing Types by Tract						
		Owner-Occupied			Rental		Vacant	
		#	%	%	#	%	#	%
Low-income	0	0	0.0	0.0	0	0.0	0	0.0
Moderate-income	9,138	4,235	8.5	46.3	3,765	41.2	1,138	12.5
Middle-income	56,999	39,489	79.0	69.3	11,742	20.6	5,768	10.1
Upper-income	7,888	6,286	12.6	79.7	1,066	13.5	536	6.8
Unknown-income	0	0	0.0	0.0	0	0.0	0	0.0
Total Assessment Area	74,025	50,010	100.0	67.6	16,573	22.4	7,442	10.1
	Total Businesses by Tract		Businesses by Tract & Revenue Size					
			Less Than or = \$1 Million		Over \$1 Million		Revenue Not Reported	
			#	%	#	%	#	%
Low-income	0	0.0	0	0.0	0	0.0	0	0.0
Moderate-income	1,539	31.1	1,321	30.4	174	36.5	44	32.8
Middle-income	3,050	61.6	2,695	62.1	270	56.6	85	63.4
Upper-income	365	7.4	327	7.5	33	6.9	5	3.7
Unknown-income	0	0.0	0	0.0	0	0.0	0	0.0
Total Assessment Area	4,954	100.0	4,343	100.0	477	100.0	134	100.0
Percentage of Total Businesses:			87.7		9.6		2.7	
	Total Farms by Tract		Farms by Tract & Revenue Size					
			Less Than or = \$1 Million		Over \$1 Million		Revenue Not Reported	
			#	%	#	%	#	%
Low-income	0	0.0	0	0.0	0	0.0	0	0.0
Moderate-income	33	16.3	33	16.4	0	0.0	0	0.0
Middle-income	159	78.7	159	79.1	0	0.0	0	0.0
Upper-income	10	5.0	9	4.5	0	0.0	1	100.0
Unknown-income	0	0.0	0	0.0	0	0.0	0	0.0
Total Assessment Area	202	100.0	201	100.0	0	0.0	1	100.0
Percentage of Total Farms:			99.5		0.0		0.5	

CONCLUSIONS WITH RESPECT TO PERFORMANCE TESTS IN THE PARKERSBURG-MARIETTA, WEST VIRGINIA-OHIO MSA

Lending Test

WesBanco's performance on the lending test is for this assessment area is "Outstanding." Loans are reasonably distributed among the different census tracts and lending to low- and moderate-income borrowers and small businesses continues to be excellent. Community development loans enhanced the bank's performance.

Lending Activity

Lending levels reflect excellent responsiveness to credit needs throughout this assessment area given its moderate size in comparison to WesBanco's overall lending activity.

The bank made \$66.0 million in loans in the Parkersburg-Marietta MSA in the evaluation period. This represented 10.9% of WesBanco's lending activity. The percentage of loans is more than both the percentage of offices and the percentage of deposits at 9.0% and 9.9%, respectively, in the assessment area. WesBanco ranked 5th of 248 HMDA reporters and eighth of 40 CRA reporters in multistate metropolitan area.

Geographic Distribution

The geographic distribution of loans is good. The geographic distribution of HMDA loans is excellent, while the geographic distribution of small business loans is considered adequate. At the prior evaluation, the geographic distribution was excellent. The change was due the decline in small business lending to moderate-income tracts.

WesBanco made loans to all tracts in this assessment area within the evaluation period. As previously mentioned, there are no low-income tracts in this assessment area.

Home Purchase Loans

The bank made 12.4% of its home purchase loans in moderate-income tracts, which is greater than percentage of owner-occupied units in these tracts at 8.5%. WesBanco also originated more home purchase loans in moderate-income tracts than the aggregate of all HMDA lenders at 10.7%. Therefore, the geographic distribution of home purchase of home purchase loans to moderate-income tracts is excellent.

WesBanco originated 74.6% and 12.9% of its home purchase loans in middle- and upper-income tracts, respectively, compared to the percentage of owner-occupied units in middle- and upper-income tracts at 79.0% and 12.6%. The aggregate of HMDA lenders made 75.6% and 13.5% of their loans in the middle- and upper-income geographies.

Refinance Loans

WesBanco made 8.1% of its refinance loans in moderate-income tracts, which was comparable to the percentage of owner-occupied units in these tracts at 8.5% and the percentage of the aggregate of all HMDA reporters' lending in these tracts at 8.9%. Thus, the geographic distribution of refinance loans to moderate-income tracts is good.

The bank made 77.5% and 14.4% of its refinance loans in middle- and upper-income tracts, respectively, compared to the percentage of owner-occupied units in middle- and upper-income tracts at 79.0% and 12.6%. The aggregate of all HMDA lenders made 77.6% and 13.3% of their loans in the middle- and upper-income geographies.

Home Improvement Loans

The bank originated 11.9% of its home improvement loans in moderate-income geographies, which was more than both the percentage of owner-occupied units in these tracts at 8.5% and the percentage of percentage of the aggregate of all HMDA reporters who made 9.7% of their home improvement loans in these tracts. Thus, the geographic distribution of home improvement loans to moderate-income tracts is excellent.

The bank made 79.2% and 8.8% of its home improvement loans in middle- and upper-income tracts, respectively, compared to the percentage of owner-occupied units in middle- and upper-income tracts at 79.0% and 12.6%. The aggregate of all HMDA lenders made 76.9% and 13.5% of their loans in the middle- and upper-income geographies.

Small Business Loans

WesBanco made 19.0% of its small loans to businesses in the moderate-income tracts, which was less than the percentage of businesses in these tracts at 31.1% and the percentage of the aggregate of all CRA reporters' loans at 22.7%. Therefore, the geographic distribution of small loans to businesses in moderate-income tracts is adequate.

The bank originated 70.9% and 10.1% of its small loans to businesses in middle- and upper-income tracts, respectively, compared to the percentage businesses in middle- and upper-income tracts at 61.6% and 7.4%. The aggregate of all CRA lenders made 62.1% and 11.7% of their small loans to businesses in the middle- and upper-income geographies.

Distribution by Borrower Income and Revenue Size of the Business

The borrower distribution of loans is excellent, which is the same as the prior evaluation. HMDA and CRA lending are both excellent, especially to moderate-income borrowers.

Home Purchase Loans

WesBanco made 16.7% of its home purchase loans to low-income borrowers, which was less than the percentage of low-income families at 18.8%. The bank made a higher percentage of home purchase loans to low-income borrowers than the aggregate of all HMDA lenders at 10.0%. Therefore, the borrower distribution of home purchase loans to low-income borrowers is excellent given that the percentage of loans to low-income borrowers substantially exceeded the aggregate of all HMDA lenders' lending levels. Further, the poverty level in the assessment area is 10.1%.

The bank originated 23.4% of its home purchase loans to moderate-income borrowers, which was greater than both the percentage of moderate-income families at 19.0% and the percentage of loans made by the aggregate of all HMDA reporters at 20.3%. Thus, the borrower distribution of home purchase loans to moderate-income borrowers is excellent.

WesBanco made 23.9% and 28.7% of its home purchase loans to middle- and upper-income borrowers, respectively, compared to the percentage of middle- and upper-income families at 22.4% and 39.8%. The aggregate of all HMDA lenders made 23.8% and 36.5% of their loans to middle- and upper-income borrowers. The borrowers' income was not available for 7.2% of the home purchase loans made in this assessment area.

Refinance Loans

The bank made 10.8% of its refinance loans to low-income borrowers, which was lower than the percentage of low-income families at 18.8%. WesBanco originated more refinance loans to loan-income borrowers than the aggregate of all HMDA lenders' percentage of 9.4%. The borrower distribution of these loans to low-income borrowers is good given the relatively high poverty level and the fact the bank outperformed the aggregate of all HMDA lenders.

WesBanco originated 20.7% of its refinance loans to moderate-income borrowers, which exceeded the percentage of moderate-income families at 19.0% and the percentage of loans made by the aggregate of all HMDA lenders to moderate-income borrowers at 18.1%. Therefore, the borrower distribution of refinance loans to moderate-income borrowers is excellent.

The bank made 27.9% and 36.0% of its refinance loans to middle- and upper-income borrowers, respectively, compared to the percentage of middle- and upper-income families at 22.4% and 39.8%. The aggregate of all HMDA lenders made 26.7% and 35.5% of their loans to middle- and upper-income borrowers. The borrowers' income was not available for 4.5% of the refinance loans made in this assessment area.

Home Improvement Loans

WesBanco made 31.4% of its home improvement loans to low-income borrowers, which surpassed the percentage of low-income families at 18.8% and the percentage of loans made by the aggregate of all HMDA lenders at 10.4%. Therefore, the borrower distribution of home improvement loans to low-income borrowers is excellent.

The bank originated 45.9% of its home improvement loans to moderate-income borrowers, which exceeded the percentage of moderate-income families at 19.0% and the percentage of loans made by the aggregate of all HMDA lenders at 20.9%. Thus, the borrower distribution of home improvement loans to moderate-income borrowers is excellent.

WesBanco made 10.7% and 10.1% of its home improvement loans to middle- and upper-income borrowers, respectively, compared to the percentage of middle- and upper-income families at 22.4% and 39.8%. The aggregate of all HMDA lenders made 29.7% and 35.8% of their loans to middle- and upper-income borrowers. The borrowers' income was not available for 1.9% of the home improvement loans made in this assessment area.

Small Business Loans

The bank made 88.7% of its small business loans to businesses with revenues of less than \$1 million compared to the aggregate of all CRA lenders who made 35.3% of total small business loans to these businesses. Businesses with less than \$1 million in revenue account for 87.7% of all businesses in the assessment area. Based on this analysis, the bank's lending to businesses with revenues of less than \$1 million is considered excellent.

Community Development Lending

WesBanco is a leader in making community development loans in the Parkersburg-Marietta multistate area. During the evaluation period, the bank made nine qualified loans totaling \$10,584,050. Eight of the loans were to provide services to low- and moderate-income individuals, while one was for economic development. The second highest percentage of qualified loans was made in this assessment area at 11.4% of total loans. In addition, community development loans increased 13.2% since the prior period evaluation.

Investment Test

WesBanco's performance under the investment test is "Outstanding." Five new investments equaling \$228,119 represent the assessment area's share of three mortgage-backed securities and two equity investments in affordable housing loan funds. The outstanding balances of 22 prior investments equaled approximately \$2.4 million as of year-end 2006. Further, 22 donations equaling \$57,262 were made to several community development organizations.

Service Test

WesBanco's performance under the service test is "Outstanding." The closing of the office in the high-income tract did not affect the accessibility of its delivery systems and the bank provided a variety of community development services that steadily increased during the evaluation period.

Retail Services

Retail delivery systems are readily accessible to the bank's geographies and individuals of different income levels in its assessment areas. WesBanco's record of opening and closing of branches has not adversely affected the accessibility of its delivery systems, particularly to low- and moderate-income individuals and/or geographies. Services do not vary in a way that inconveniences its assessment area, particularly low- and moderate-income geographies and/or individuals.

Two offices, one without an ATM and one with a cash-only ATM, are in moderate-income geographies. The majority of the branches are in middle-income tracts, where there are two branches with full service ATMs, two offices with cash-only ATMs, one branch without an ATM, and three cash-only ATMs. There is also one cash-only ATM in an upper-income tract. The following table illustrates the percentage of offices and full service ATMs compared to the tract distribution and percentage of families in each tract category.

Tract Category	Tract Distribution (%)	Percentage of Families by Tract	Percentage of Branches	Percentage of Full Service ATMs
Low	0.0	0.0	0.0	0.0
Moderate	17.4	9.6	28.6	0.0
Middle	69.6	78.4	71.4	100.0
Upper	13.0	12.0	0.0	0.0

In October 2006, the bank expanded its drive-in facility in a moderate-income tract in Marietta to a full-service office. When this office was opened, WesBanco closed its existing Marietta office, which was located in the same tract. The Devola, Ohio office was closed in May 2006. This branch was located in an upper-income geography. The accessibility of delivery systems were not affected by the closure of this branch as the Marietta office is within two miles.

Community Development Services

WesBanco is a leader in making community development services. Below are a few examples of the bank's community development services:

Examples of qualified community development services include:

- *Area Roundtable* – This organization promotes economic development and revitalization of downtown Parkersburg and Wood County. A bank employee is the treasurer for the executive committee and board of directors.

- *Community Homebuyer Investment Program (“CHIP”)* – One bank employee serves on the board of directors of this organization and others have provided training to CHIP participants. CHIP promotes home ownership opportunities through outreach and education activities, primarily to low- and moderate-income individuals.
- *EITC Coalition of Mid-Ohio Valley* – An employee provided assistance to start the organization’s savings campaign targeted to low- and moderate-income individuals.
- *Lions Club of Parkersburg* – The club dedicates more than half of its expenditures to purchase eyeglasses for indigent persons. A bank employee is treasurer of this organization.
- *SW Resources, Inc.* – An employee has provided fundraising assistance to this agency, which provides vocational services and employment opportunities for disabled individuals, the majority of which are low- and moderate-income individuals.

MULTISTATE METROPOLITAN AREA

CRA RATING FOR: Weirton-Steubenville, WV-OH MSA:¹⁷ Outstanding

The Lending Test is rated: High Satisfactory

The Investment Test is rated: Outstanding

The Service Test is rated: Outstanding

Major factors supporting the institution's rating include:

- Lending levels reflect good responsiveness to assessment area credit needs;
- The geographic distribution of loans reflects adequate penetration throughout the assessment areas;
- The distribution of borrowers reflects, given the product lines offered, excellent penetration among customers of different income levels and businesses of different sizes;
- The bank makes a relatively high level of community development loans;
- The bank has an excellent level of qualified community development investments and grants, often in a leadership position;
- Delivery systems are accessible to essentially all portions of the bank's assessment areas.
- The record of opening and closing of branches has not adversely affected the accessibility of its delivery systems, particularly low- and moderate-income geographies and/or low- or moderate-income individuals; and,
- A leader in providing community development services.

SCOPE OF EXAMINATION

Refinance loans were not reviewed for the Weirton-Steubenville MSA, as there was not enough of these loans to perform a meaningful analysis. Otherwise, the scope of the examination for the assessment area is consistent with the scope of the examination for the institution. This assessment area received a full scope review.

DESCRIPTION OF INSTITUTION'S OPERATIONS IN THE WEIRTON- STEUBENVILLE WEST VIRGINIA-OHIO MSA

The Weirton-Steubenville multistate assessment area was the third largest market by deposit share at 10.4% and 5.3% of the bank's loans were made in this assessment area.

¹⁷ 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 within the multistate metropolitan area.

This assessment area consists of the entirety of the Weirton-Steubenville, WV-OH MSA, which includes Brooke and Hancock Counties in West Virginia's panhandle and Jefferson County in southeastern Ohio. The assessment area is comprised of 39 tracts: 1 low-, 4 moderate-, 32 middle-, and 2 upper-income tracts. The low- and moderate-income tracts are all located in Jefferson County, with the one low- and three-moderate geographies in the city of Steubenville itself and a moderate-income tract north of the city.

As of June 30, 2006, WesBanco ranked second out of 14 institutions in the Weirton-Steubenville, WV-OH multistate metropolitan area with 17.2% of total deposits.¹⁸ Other institutions having greater than 10% of the market share in this MSA included Sky Bank, Hancock County Savings Bank, F.S.B. headquartered in Chester, National City Bank, and Parkvale Savings Bank, which is located in Monroeville, Pennsylvania.

A community contact was made to a business development organization which serves Brooke and Hancock Counties. The contact indicated that there was plentiful housing stock, in fact, almost an oversupply. They also noted that there were pockets of poverty in New Cumberland and Weir Avenue in Weirton. Like the contact for Parkersburg-Marietta, the contact stated that WesBanco has greatly assisted the organization; however, they always feel that the quality of services has declined since operations were centralized in Wheeling.

Population Characteristics

The population within this assessment area was 132,008 as of 2000 census. Population growth in the assessment area from 1990 to 2000 and 2000 to 2006 is shown below¹⁹:

County Name, State	Population Change 1990 to 2000 (%)	Population Change 2000 to 2006 (%)
Jefferson County, Ohio	-8.0	-5.1
Brooke County, West Virginia	-5.7	-5.2
Hancock County, West Virginia	-7.3	-5.4

The population is primarily White non-Hispanic at 94.1%. Black non-Hispanics are the largest minority group at 4.2%. Of the total population, 21.1% were age 17 years and younger, 8.4% were age 18 to 24 years, 52.1% were age 25 to 64 years, and 18.5% were age 65 and over.

¹⁸ FDIC Summary of Deposits: www.fdic.gov

¹⁹ USDA Economic Research: www.ers.usda.gov

Income Characteristics

The median family income for the Weirton-Steubenville multistate metropolitan area was \$39,496, which exceeded the State of West Virginia's median family income of \$36,484, but was less than the State of Ohio's median family income of \$50,037. Families comprised 68.9% of the households in the assessment area. The poverty level in this assessment area was 10.4%, which was lower than West Virginia's level of 13.9%, but higher than Ohio's level of 7.8%. Of the families living in the assessment area, 18.8% were low-income families, 18.9% were moderate-income families, 23.5% were middle-income families, and 38.9% were upper-income families.

Housing Characteristics

As of the 2000 census, there were 59,169 housing units in the assessment area, of which 69.5% were owner-occupied. The majority of the units (85.0%) housed 1-4 families, while 6.3% housed 5 families or more and 8.7% were mobile homes. Most of the units (50.5%) in the low-income tracts were rentals and about half (47.0%) of the units in the moderate-income geographies were also rental properties. The vacancy rate in the low- and moderate-income tracts at 13.5% and 14.1%, respectively, exceeded the overall vacancy rates for Ohio and West Virginia at 7.1% and 12.8%. The median age of the housing stock was 45 years, which exceeded the median ages of housing stock in both Ohio and West Virginia of 38 and 31 years, respectively.

Labor, Employment, and Economic Characteristics

The 2006 annual average unemployment rate for the Weirton-Steubenville MSA was 7.3%, which was significantly higher than the nationwide average of 4.6% and placed the multistate metropolitan area in the top 5% of unemployment rates among MSAs in the country. The unemployment rate was also much higher than Ohio's average of 5.5% and West Virginia's rate of 4.9%.²⁰ The average unemployment rates for the three counties in the assessment area were as follows:

Jefferson County, Ohio	7.0%
Brooke County, West Virginia	7.4%
Hancock County, West Virginia	7.7%

²⁰ www.bls.gov/lau

Weirton is home to Weirton Steel Company, which is the eighth largest integrated steel producer in the country.²¹ Large employers in Brooke County are Bethany College, Stone Container Corporation, and Weirton Medical Center. Employers in Hancock County include Ball Metal Food Container Corporation, Bellofram Corporation (a manufacturer of gauges), Ergon-West Virginia, Inc. (a petroleum refinery), and The Homer Laughlin China Company.²² Major employers of Jefferson County, Ohio include four school districts: Buckeye Local in Rayland; Edison Local in Richmond; Indian Creek Local in Wintersville; and Steubenville City. Other employers are Franciscan University of Steubenville, Titanium Metals Corporation, and Wheeling-Pittsburgh Steel.²³

Key demographic information about the assessment area is on the following page.

²¹ City of Weirton, WV: www.cityofweirton.com

²² Regional Conditions from the Federal Reserve Bank of Richmond: www.richmondfed.org

²³ Ohio County Profiles of the Office of Strategic Research, Ohio Department of Development: <http://www.odod.state.oh.us/research/>

Combined Demographics Report

WesBanco Bank

Analysis Year: 2005 & 2006

Assessment Area(s): Weirton-Stubenville WV-OH MSA 48260

Income Categories	Tract Distribution		Families by Tract Income		Families < Poverty Level as % of Families by Tract		Families by Family Income	
	#	%	#	%	#	%	#	%
Low-income	1	2.6	273	0.7	121	44.3	7,046	18.8
Moderate-income	4	10.3	2,274	6.1	573	25.2	7,090	18.9
Middle-income	32	82.1	32,925	87.8	3,095	9.4	8,813	23.5
Upper-income	2	5.1	2,048	5.5	123	6.0	14,571	38.8
Unknown-income	0	0.0	0	0.0	0	0.0	0	0.0
Total Assessment Area	39	100.0	37,520	100.0	3,912	10.4	37,520	100.0
	Housing Units by Tract	Housing Types by Tract						
		Owner-Occupied			Rental		Vacant	
		#	%	%	#	%	#	%
Low-income	580	209	0.5	36.0	293	50.5	78	13.4
Moderate-income	4,927	1,920	4.7	39.0	2,314	47.0	693	14.1
Middle-income	50,476	36,707	89.3	72.7	10,050	19.9	3,719	7.4
Upper-income	3,186	2,261	5.5	71.0	737	23.1	188	5.9
Unknown-income	0	0	0.0	0.0	0	0.0	0	0.0
Total Assessment Area	59,169	41,097	100.0	69.5	13,394	22.6	4,678	7.9
	Total Businesses by Tract		Businesses by Tract & Revenue Size					
			Less Than or = \$1 Million		Over \$1 Million		Revenue Not Reported	
			#	%	#	%	#	%
Low-income	40	1.1	33	1.0	7	2.6	0	0.0
Moderate-income	411	11.5	363	11.5	40	14.8	8	5.9
Middle-income	2,873	80.7	2,542	80.5	209	77.4	122	90.4
Upper-income	237	6.7	218	6.9	14	5.2	5	3.7
Unknown-income	0	0.0	0	0.0	0	0.0	0	0.0
Total Assessment Area	3,561	100.0	3,156	100.0	270	100.0	135	100.0
	Percentage of Total Businesses:			88.6		7.6		3.8
	Total Farms by Tract		Farms by Tract & Revenue Size					
			Less Than or = \$1 Million		Over \$1 Million		Revenue Not Reported	
			#	%	#	%	#	%
Low-income	0	0.0	0	0.0	0	0.0	0	0.0
Moderate-income	0	0.0	0	0.0	0	0.0	0	0.0
Middle-income	87	100.0	86	100.0	0	0.0	1	100.0
Upper-income	0	0.0	0	0.0	0	0.0	0	0.0
Unknown-income	0	0.0	0	0.0	0	0.0	0	0.0
Total Assessment Area	87	100.0	86	100.0	0	0.0	1	100.0
	Percentage of Total Farms:			98.9		0.0		1.1

CONCLUSIONS WITH RESPECT TO PERFORMANCE TESTS IN THE WEIRTON- STEUBENVILLE, WEST VIRGINIA-OHIO MSA

Lending Test

WesBanco's performance on the lending test is for this assessment area is "High Satisfactory." The geographic distribution is adequate and has improved with more lending to the low- and moderate-income tracts, while lending to low- and moderate-income borrowers and small business is good. Community development loans helped to enhance the bank's lending performance.

Lending Activity

Lending levels reflect good responsiveness to credit needs throughout this assessment area given its size in comparison to WesBanco's overall lending activity.

The bank originated \$31.5 million in loans in the Weirton-Steubenville MSA during the evaluation period. This represented 5.3% of total loans, which was less than the percentage of deposits and offices in this assessment area at 10.4% and 6.4%, respectively. WesBanco ranked ninth of 220 institutions for HMDA lending and eighth of 33 banks for CRA loans in the multistate metropolitan area.

Geographic Distribution

The geographic distribution of loans is adequate, which is an improvement over the prior evaluation when the geographic distribution was poor. A greater percentage of loans were made in moderate-income tracts.

No HMDA loans made in the low-income tract and loans were only made in 2 of the 4 moderate-income tracts. However for CRA-type loans, the bank made loans in 3 of the 4 moderate-income tracts.

Home Purchase Loans

The bank made 3.1% of its home purchase loans in the moderate-income tracts, which was less than the percentage of owner-occupied units in these geographies at 4.7% and the percentage of loans made by the aggregate of all HMDA lenders at 5.4%. Therefore, the geographic distribution of home purchase loans to moderate-income tracts is adequate.

WesBanco originated 87.6% and 9.3% of its home purchase loans in middle- and upper-income tracts, respectively, compared to the percentage of owner-occupied units in these tracts at 89.3% and 5.5%. The aggregate of all HMDA lenders made 89.5% and 5.0% of their loans in the middle- and upper-income tracts.

Home Improvement Loans

WesBanco made 1.3% of its home improvement loans in moderate-income geographies, which was less than both the percentage of owner-occupied units in this tract at 4.7% and the percentage of loans made by the aggregate of all HMDA lenders at 4.9%. Thus, the geographic distribution of home improvement loans to moderate-income tracts is poor.

The bank originated 96.3% and 2.5% of its home improvement loans in middle- and upper-income tracts, respectively, compared to the percentage of owner-occupied units in these tracts at 89.3% and 5.5%. The aggregate of all HMDA lenders made 91.8% and 3.3% of their loans in the middle- and upper-income tracts.

Small Business Loans

WesBanco originated 0.5% of its small loans to businesses in the moderate-income tracts, which was significantly lower than both the percentage of businesses in these geographies and 11.5% and the percentage of loans made by the aggregate of all CRA lenders at 8.3%. Therefore, the geographic distribution of small loans to businesses in the moderate-income geographies is poor.

WesBanco made 90.8% and 8.9% of its small loans to businesses in middle- and upper-income tracts, respectively, compared to the percentage of businesses in the middle- and upper-income tracts at 80.7% and 8.8%. The aggregate of all CRA lenders made 80.1% and 7.9% of their loans in the middle- and upper-income tracts.

Distribution by Borrower Income and Revenue Size of the Business

The borrower distribution of loans is excellent for both CRA and HMDA loan products.

Home Purchase Loans

The bank made 14.4% of its home purchase loans to low-income borrowers, which was less than the percentage of low-income families at 18.8%. WesBanco made a higher percentage loans to low-income borrowers than the percentage of the aggregate of all HMDA reporters' loans at 9.5%. Thus, the borrower distribution of home purchase loans to low-income borrowers is excellent given the poverty level of 10.4% and since the bank made a significantly higher percentage of loans to low-income borrowers than the aggregate of all HMDA lenders.

WesBanco originated 27.8% of its home purchase loans to moderate-income borrowers, which exceeded the percentage of moderate-income families at 18.9% and the percentage of loans by the aggregate of all HMDA lenders at 22.8%. Therefore, the borrower distribution of home purchase loans to moderate-income borrowers is excellent.

WesBanco made 13.4% and 32.0% of its home purchase loans to middle- and upper-income borrowers, respectively, compared to the percentage of middle- and upper-income families at 23.5% and 38.8%. The aggregate of all HMDA lenders originated 28.2% and 25.4% of their loans to middle- and upper-income borrowers. The borrowers' income was not available for 12.4% of the bank's loans in this assessment area.

Home Improvement Loans

WesBanco originated 32.5% of its home improvement loans to low-income borrowers, which surpassed both the percentage of low-income families at 18.8% and the percentage of loans made by the aggregate of all HMDA lenders at 10.5%. Thus, the borrower distribution of home improvement loans to low-income borrowers is excellent.

The bank made 42.5% of its home improvement loans to moderate-income borrowers, which exceeded the percentage of moderate-income families at 18.9% and the percentage of loans made by the aggregate of all HMDA lenders at 19.7%. Therefore, the borrower distribution of home improvement loans to moderate-income borrowers is excellent.

WesBanco made 5.0% and 16.3% of its home improvement loans to middle- and upper-income borrowers, respectively, compared to the percentage of middle- and upper-income families at 23.5% and 38.8%. The aggregate of all HMDA lenders originated 26.9% and 40.7% of their loans to middle- and upper-income borrowers. The borrowers' income was not available for 3.8% of the bank's loans in this assessment area.

Small Business Loans

The bank made 72.8% of its small loans to businesses with less than \$1 million in revenue compared to the 88.6% of all businesses in the assessment area with less than \$1 million in revenue. WesBanco made a higher percentage of loans than loans made by the aggregate of all CRA lenders at 37.4%. Consequently, the borrower distribution of loans to small businesses is excellent given that the bank made a significantly higher percentage of loans to small businesses than its competitors.

Community Development Lending

The bank makes a relatively high level of community development loans. WesBanco originated three qualified community development loans totaling \$3,075,150. One loan provided affordable housing to low- and moderate-income individuals, while two were for services directed to low- and moderate-income individuals. Approximately 3.3% of the bank's total qualified community development loans are in this assessment area. Community development loans decreased 50.5% from the prior period evaluation.

Investment Test

WesBanco's performance under the investment test is "Outstanding." Five new investments equaling \$165,380 represent the assessment area's share of three mortgage-backed securities and two equity investments in affordable housing loan funds. There were also 26 investments made in a prior period with unamortized balances of \$3,842,182 as of December 31, 2006. Additionally, 5 donations equaling \$3,800 were made to a variety of community development organizations.

Service Test

WesBanco's performance under the service test is "Outstanding." Retail services are good, while community development services are excellent.

Retail Services

Retail delivery systems are accessible to the bank's geographies and individuals of different income levels in its assessment areas. WesBanco's record of opening and closing of branches has not adversely affected the accessibility of its delivery systems, particularly to low- and moderate-income individuals and/or geographies. Services do not vary in a way that inconveniences its assessment area, particularly low- and moderate-income geographies and/or individuals.

There are two cash-only ATMs located in moderate-income tracts in Steubenville. Most of the branches are in middle-income geographies, with three branches with cash-only ATMs, one branch without an ATM, and two cash-only ATMs in these tracts. A cash-only ATM and a branch with a cash-only ATM are located in upper-income tracts, both of which are located in Steubenville. The following table illustrates the distribution of the bank's offices compared to the tract distribution and percentage of families in each tract. There is no stand-alone full service ATMs in this assessment area.

Tract Category	Tract Distribution (%)	Percentage of Families by Tract	Percentage of Branches
Low	2.6	0.7	0.0
Moderate	10.3	6.1	0.0
Middle	82.1	87.8	80.0
Upper	5.1	5.5	20.0

Community Development Services

WesBanco is a leader in making community development services. Examples of qualified community development services include:

- *Business Development Corp.* – A bank employee serves on the board of directors of the organization, which promotes economic development in Brooke and Hancock Counties.
- *Change, Inc.* – This organization sponsors a home buyer equity fund that is designed to help first-time home buyers with income levels less than 80% of median. An employee provided a training class on budgeting and credit.
- *City of Steubenville Planning and Zoning Commission* – An employee is a member of the planning committee to help coordinate housing to low- and moderate-income households.
- *Hancock County Sheltered Workshop* – This organization provides physically and mentally challenged individuals with employment opportunities, the majority of which are low- and moderate-income individuals. A bank employee assisted in fundraising activities.
- *Jefferson Metropolitan Housing Authority* – This housing organization mostly serves low- and moderate-income individuals. One employee started a Section 8 homeownership program while another is a member of the family self-sufficiency and program coordinating committee.
- *Northern Panhandle Workforce Investment Board* – An employee serves on the board of directors of this organization, which provides assistance to unemployed and underemployed individuals with workforce training.
- *Steubenville Hilltop Community Development Corporation* – This organization promotes economic development and revitalization of a low-income area. An employee serves on the board of directors.
- *Weirton Medical Center* – An employee is the treasurer of the board of directors and chairman of the finance committee to this hospital. The majority of its patients receive are low- and moderate-income individuals.

STATE OF WEST VIRGINIA

CRA RATING FOR: State of West Virginia:²⁴ Outstanding

The Lending Test is rated: Outstanding

The Investment Test is rated: Outstanding

The Service Test is rated: Outstanding

Major factors supporting the institution's rating include:

- Lending levels reflect excellent responsiveness to assessment area credit needs;
- The geographic distribution of loans reflects good penetration throughout the assessment areas;
- The distribution of borrowers reflects, given the product lines offered, good penetration among customers of different income levels and businesses of different sizes;
- The bank is a leader in making community development loans;
- The bank has an excellent level of qualified community development investments and grants, often in a leadership position;
- Delivery systems are readily accessible to all portions of the bank's assessment areas.
- The record of opening and closing of branches has not adversely affected the accessibility of its delivery systems, particularly low- and moderate-income geographies and/or low- or moderate-income individuals; and,
- A leader in providing community development services.

SCOPE OF EXAMINATION

The scope of the examination for the State of West Virginia is consistent with the scope of the examination for the institution. The Morgantown MSA, Charleston MSA, and statewide non-metropolitan area received full scope reviews and thus were weighted more heavily than the Jackson County non-metropolitan area, which had a limited scope review.

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

Approximately one-quarter (27.7%) of WesBanco's deposits were in West Virginia, while the

²⁴ 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.

lending share was 37.7%. Additionally, 35.9% of the bank's offices are located in West Virginia.

WesBanco's operations in West Virginia are concentrated in the western portion of the state. There are 133 tracts in the West Virginia portion of the assessment area, which includes 1 low-, 18 moderate-, 79 middle-, and 35 upper-income tracts. Three middle-income tracts in Wetzel County are distressed.

Since the prior period evaluation, WesBanco sold its offices in Ritchie County. Further, Jackson County, which is not in a metropolitan statistical area, is a separate assessment area. The county cannot be combined with any other assessment area, as its surrounding counties are either not in the bank's assessment area or are part of a metropolitan statistical area.

Key demographic information about the State of West Virginia is on the following page.

Combined Demographics Report

WesBanco Bank

Analysis Year: 2005 & 2006

Assessment Group(s): All WV

Income Categories	Tract Distribution		Families by Tract Income		Families < Poverty Level as % of Families by Tract		Families by Family Income	
	#	%	#	%	#	%	#	%
Low-income	1	0.8	236	0.2	138	58.5	25,606	19.1
Moderate-income	18	13.5	12,501	9.3	2,452	19.6	22,724	17.0
Middle-income	79	59.4	85,540	63.8	11,121	13.0	27,005	20.1
Upper-income	35	26.3	35,780	26.7	2,490	7.0	58,722	43.8
Unknown-income	0	0.0	0	0.0	0	0.0	0	0.0
Total Assessment Area	133	100.0	134,057	100.0	16,201	12.1	134,057	100.0
	Housing Units by Tract	Housing Types by Tract						
		Owner-Occupied			Rental		Vacant	
		#	%	%	#	%	#	%
Low-income	909	94	0.1	10.3	740	81.4	75	8.3
Moderate-income	24,797	12,634	8.6	50.9	9,311	37.5	2,852	11.5
Middle-income	140,920	93,681	63.8	66.5	32,737	23.2	14,502	10.3
Upper-income	60,411	40,339	27.5	66.8	15,260	25.3	4,812	8.0
Unknown-income	0	0	0.0	0.0	0	0.0	0	0.0
Total Assessment Area	227,037	146,748	100.0	64.6	58,048	25.6	22,241	9.8
	Total Businesses by Tract		Businesses by Tract & Revenue Size					
			Less Than or = \$1 Million		Over \$1 Million		Revenue Not Reported	
			#	%	#	%	#	%
Low-income	970	6.6	797	6.3	138	9.0	35	7.7
Moderate-income	2,059	14.0	1,777	14.0	232	15.2	50	10.9
Middle-income	7,470	50.9	6,459	50.9	729	47.8	282	61.7
Upper-income	4,168	28.4	3,652	28.8	426	27.9	90	19.7
Unknown-income	0	0.0	0	0.0	0	0.0	0	0.0
Total Assessment Area	14,667	100.0	12,685	100.0	1,525	100.0	457	100.0
Percentage of Total Businesses:			86.5		10.4		3.1	
	Total Farms by Tract		Farms by Tract & Revenue Size					
			Less Than or = \$1 Million		Over \$1 Million		Revenue Not Reported	
			#	%	#	%	#	%
Low-income	0	0.0	0	0.0	0	0.0	0	0.0
Moderate-income	49	18.4	48	18.3	1	50.0	0	0.0
Middle-income	169	63.5	167	63.5	1	50.0	1	100.0
Upper-income	48	18.0	48	18.3	0	0.0	0	0.0
Unknown-income	0	0.0	0	0.0	0	0.0	0	0.0
Total Assessment Area	266	100.0	263	100.0	2	100.0	1	100.0
Percentage of Total Farms:			98.9		0.8		0.4	

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

Lending Test

WesBanco's performance on the lending test for the State of West Virginia is "Outstanding." Lending is reasonably disbursed throughout tracts of different income levels, especially to low- and moderate-income geographies. Loans to low- and moderate-income borrowers and small businesses and farms are good. WesBanco has increased its community development loan activity since the prior evaluation and is considered a leader, thus enhancing the overall lending test rating.

Lending Activity

Lending levels reflect excellent responsiveness to the State of West Virginia's credit needs throughout this assessment area given its large size in comparison to WesBanco's overall lending activity. While the geographic and borrower distribution are good, community development loans enhanced the bank's lending performance.

Lending activity reflects an excellent responsiveness to assessment area credit needs given the size of this market.

The bank made \$234.3 million in loans in West Virginia during the evaluation period, representing 37.8% of its lending activity. The percentage of loans is higher than both the percentage of offices and the percentage of deposits in the State of West Virginia at 35.9% and 27.7%, respectively. WesBanco ranked third of 298 HMDA reporters and ninth of 54 CRA reporters in the state.

Geographic Distribution

The geographic distribution of loans is good, compared to the prior evaluation when it was excellent. A smaller percentage of HMDA and CRA loans were made in moderate-income tracts in the nonmetropolitan assessment area, which was given the greatest weight of the assessment areas in the state of West Virginia.

Borrower Distribution

The borrower distribution of loans is good, compared to the prior evaluation period when it was excellent. The percentage of loans made to low- and moderate-income borrowers decreased overall.

Community Development Lending

WesBanco is a leader in making community development loans in the State of West Virginia. The bank made 27 loans totaling \$11,614,955, which was an increase of 7.7% from the prior period evaluation. About one-eighth (12.5%) of the community development loans were made in the state.

Investment Test

WesBanco's performance under the investment test is "Outstanding." One new-mortgage backed security comprised of mostly low- and moderate-income borrowers and/or properties located in low- and moderate-income tracts was allocated among Ohio, Pennsylvania, and West Virginia. The State of West Virginia's total for this security is \$25,730. The unamortized balance of investments made in prior periods equaled approximately \$10.9 million as of year-end 2006. In addition, the bank made 49 donations equaling \$105,083 to various community development organizations in the State of West Virginia.

Service Test

WesBanco's performance under the service test is "Outstanding." Retail delivery services are readily accessible to the bank's geographies and the level of community development services is excellent.

Retail Services

Retail delivery systems are readily accessible to the bank's geographies and individuals of different income levels in the State of West Virginia. WesBanco's record of opening and closing of branches has not adversely affected the accessibility of its delivery systems, particularly to low- and moderate-income individuals and/or geographies. Services do not vary in a way that inconveniences its assessment area, particularly low- and moderate-income geographies and/or individuals.

In January 2006, the Ripley grocery store branch closed. This office, which was located in Jackson County, was in a middle-income tract. An office in Kingwood, which is in the Morgantown MSA, was relocated within the same middle-income tract in the second quarter of 2005.

The following table illustrates the percentage of WesBanco's offices and full service ATMs in the State of West Virginia compared to the tract distribution and percentage of families in each tract.

Tract Category	Tract Distribution (%)	Percentage of Families by Tract	Percentage of Branches	Percentage of Full Service ATMs
Low	0.8	0.2	0.0	0.0
Moderate	13.5	9.3	14.3	11.1
Middle	59.4	63.8	53.6	44.4
Upper	26.3	26.7	32.1	44.4

Community Development Services

WesBanco is a lender in making community development services in the State of West Virginia. Examples of community development services are described in each of the assessment areas, where various bank employees taught financial literacy classes to low- and moderate-income schools throughout the state.

METROPOLITAN AREAS

DESCRIPTION OF INSTITUTION'S OPERATIONS IN THE CHARLESTON MSA, STATE OF WEST VIRGINIA

The Charleston MSA represented 5.6% of WesBanco's deposits and 8.4% of its loans. There are five branches, three full service ATMs, and two cash-only ATMs in this assessment area.

This assessment area consists only of Kanawha County, which is part of the Charleston MSA. The MSA also includes Boone, Clay, Lincoln, and Putnam Counties and is in south central West Virginia. WesBanco does not have any offices in these other counties and the bank has decided to exclude them as part of its assessment area. The city of Charleston, the capital of West Virginia, is in Kanawha County.

There are 1 low-, 9 moderate-, 31 middle-, and 11 upper-income tracts in the assessment area for a total of 52 tracts. The low-income tract is in the city of Charleston and eight of the moderate-income tracts are along or nearby the Kanawha or Elk Rivers. The other moderate-income tract is in the outlying area of Charleston.

As of June 30, 2006, WesBanco ranked sixth out of 12 institutions in Kanawha County with 4.8% of total deposits.²⁵ Major competitors in the county included Branch Banking and Trust Company, JPMorgan Chase Bank, National Association, United Bank, City National Bank of West Virginia, which is headquartered in Charleston, and Huntington National Bank.

A community contact was made with an organization in Charleston that promotes economic and community development. The contact indicated that job losses had occurred in manufacturing, especially in chemical manufacturing; however, a new mall in the downtown area has started to attract people to the area and more small businesses are opening there. They also stated that the general economic needs were for urban renewal and small business funding. The contact felt that the banks were very involved in the local community.

Population Characteristics

As of 2000 census, the population within this assessment area was 200,073. From 1990 to 2000, the population fell by 3.6% in Kanawha County and from 2000 to 2006 population decreased by 3.8%.²⁶

The population was mostly White non-Hispanic at 90.1%, while Black non-Hispanics were the largest minority group at 7.4%. Of the total population, 21.3% were age 17 years and younger, 8.4% were age 18 to 24 years, 53.8% were age 25 to 64 years, and 16.5% were age 65 and over.

²⁵ FDIC Summary of Deposits: www.fdic.gov

²⁶ USDA Economic Research: www.ers.usda.gov

Income Characteristics

The median family income for Kanawha County was \$42,696, which was greater than both the State of West Virginia's median family income of \$36,484 and the Charleston MSA's median family income of \$40,961. Families comprised 65.0% of households. The poverty level in this assessment area was 11.2%, which is lower than the State of West Virginia's rate of 13.9%. and the Charleston MSA's level of 12.4%. Of the families living in the assessment area, 20.2% were low-income families, 17.2% were moderate-income families, 20.1% were middle-income families, and 42.6% were upper-income families.

Housing Characteristics

There were 93,788 housing units in the assessment area as of the 2000 census. Most of the units (64.6%) were owner-occupied. The percentage of units housing 1-4 families was 79.3%, while 9.5% housed five families or more. Mobile homes were 11.15% of the housing units. In the low-income tract, 81.4% of properties were rental units. The median age of the housing stock was 40 years, which was higher than the median age of housing stock in West Virginia of 31 years and the median age of the entire Charleston MSA of 33 years.

Labor, Employment, and Economic Characteristics

The 2006 annual average unemployment rate for Kanawha County was 4.4%.²⁷ This rate was slightly lower than the nationwide average of 4.6%, the Charleston MSA's average of 4.5%, and the state average of 4.9%.

Major employers in Kanawha County include Bayer Cropscience, Dow Corporation, and Herbert J. Thomas Memorial Hospital Association. State and local government are large employers, including such agencies as the City of Charleston and West Virginia Department of Health and Human Resources and West Virginia Department of Highways.²⁸

Key demographic information about the assessment area can be found on the following page.

²⁷ www.bls.gov/lau

²⁸ Regional Conditions from the Federal Reserve Bank of Richmond: www.richmondfed.org

Combined Demographics Report

WesBanco Bank

Analysis Year: 2005 & 2006

Assessment Area(s): Charleston WV MSA 16620

Income Categories	Tract Distribution		Families by Tract Income		Families < Poverty Level as % of Families by Tract		Families by Family Income	
	#	%	#	%	#	%	#	%
Low-income	1	1.9	236	0.4	138	58.5	11,293	20.2
Moderate-income	9	17.3	5,840	10.4	1,196	20.5	9,622	17.2
Middle-income	31	59.6	37,590	67.1	4,413	11.7	11,269	20.1
Upper-income	11	21.2	12,353	22.1	524	4.2	23,835	42.5
Unknown-income	0	0.0	0	0.0	0	0.0	0	0.0
Total Assessment Area	52	100.0	56,019	100.0	6,271	11.2	56,019	100.0
	Housing Units by Tract	Housing Types by Tract						
		Owner-Occupied			Rental		Vacant	
		#	%	%	#	%	#	%
Low-income	909	94	0.2	10.3	740	81.4	75	8.3
Moderate-income	10,867	5,755	9.5	53.0	3,991	36.7	1,121	10.3
Middle-income	60,934	40,831	67.4	67.0	15,105	24.8	4,998	8.2
Upper-income	21,078	13,936	23.0	66.1	5,774	27.4	1,368	6.5
Unknown-income	0	0	0.0	0.0	0	0.0	0	0.0
Total Assessment Area	93,788	60,616	100.0	64.6	25,610	27.3	7,562	8.1
	Total Businesses by Tract		Businesses by Tract & Revenue Size					
			Less Than or = \$1 Million		Over \$1 Million		Revenue Not Reported	
			#	%	#	%	#	%
Low-income	970	14.4	797	13.7	138	19.4	35	17.5
Moderate-income	912	13.5	757	13.0	141	19.8	14	7.0
Middle-income	3,400	50.5	2,946	50.6	324	45.5	130	65.0
Upper-income	1,454	21.6	1,324	22.7	109	15.3	21	10.5
Unknown-income	0	0.0	0	0.0	0	0.0	0	0.0
Total Assessment Area	6,736	100.0	5,824	100.0	712	100.0	200	100.0
Percentage of Total Businesses:			86.5		10.6		3.0	
	Total Farms by Tract		Farms by Tract & Revenue Size					
			Less Than or = \$1 Million		Over \$1 Million		Revenue Not Reported	
			#	%	#	%	#	%
Low-income	0	0.0	0	0.0	0	0.0	0	0.0
Moderate-income	4	6.3	4	6.5	0	0.0	0	0.0
Middle-income	46	73.0	45	72.6	1	100.0	0	0.0
Upper-income	13	20.6	13	21.0	0	0.0	0	0.0
Unknown-income	0	0.0	0	0.0	0	0.0	0	0.0
Total Assessment Area	63	100.0	62	100.0	1	100.0	0	0.0
Percentage of Total Farms:			98.4		1.6		0.0	

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

Lending Test

WesBanco's performance under the lending test for this assessment area is good. Lending is reasonably distributed among the different census tracts, especially to low- and moderate-income geographies. The distribution of loans to low- and moderate-income borrowers and small businesses is good. Community development loans are adequate.

Lending Activity

Lending activity reflects a good responsiveness to assessment area credit needs given the size of this market.

During the evaluation period, WesBanco originated over \$48.4 million in loans in the Charleston MSA, which represented 8.4% of total loans. This percentage exceeded the percentage of offices and percentage of deposits in the assessment area. The bank ranked eighth of 202 HMDA reporters and 12th of 38 CRA reporters in the assessment area.

Geographic Distribution

The geographic distribution of loans in this assessment area is good, which was the same as the prior period evaluation. HMDA lending is good and CRA lending was adequate.

There are no significant lending gaps in the assessment area. No HMDA loans were originated in two middle-income tracts and no CRA loans were made in two other middle-income tracts out of a total of 31 middle-income geographies.

Home Purchase Loans

Wesbanco made one home purchase loan (0.4%) in the low-income tract, which was more than the percentage of owner-occupied units in this tract at 0.2%. The bank originated the same percentage of loans in the low-income geography as the aggregate of all HMDA lenders. Thus, the geographic distribution of home purchase loans to low-income tracts is excellent.

The bank originated 11.9% of its home purchase loans in the moderate-income tracts, which exceeded the percentage of owner-occupied units in these tracts at 9.5%. The bank made more loans in these geographies than other the aggregate of all HMDA lenders at 6.8%. Therefore, the geographic distribution of home purchase loans to moderate-income tracts is excellent.

WesBanco originated 56.4% and 31.3% of its home purchase loans in middle- and upper-income tracts, respectively, compared to the percentage of owner-occupied units in these tracts at 67.4% and 23.0%. The aggregate of all HMDA lenders made 60.9% and 32.0% of their home purchase loans in the middle- and upper-income tracts.

Refinance Loans

WesBanco made no refinance loans in the low-income tract; however, only 0.2% of owner-occupied units are in this geography. The aggregate of all HMDA lenders originated 0.3% of their refinance loans in this geography. Thus, the geographic distribution of refinance loans in the low-income tract is adequate.

The bank originated 17.5% of its refinance loans in the middle-income tracts, which is higher than the percentage of owner-occupied units in this geography at 9.5%. The bank made a greater percentage of loans than the percentage of loans made by the aggregate of all HMDA lenders at 8.2%. Therefore, the geographic distribution of refinance loans to the moderate-income tracts is excellent.

WesBanco originated 50.9% and 31.6% of its refinance loans in middle- and upper-income tracts, respectively, compared to the percentage of owner-occupied units in these tracts at 67.4% and 23.0%. The aggregate of all HMDA lenders made 61.4% and 30.0% of their refinance loans in the middle- and upper-income tracts.

Home Improvement Loans

No home improvement loans were made in the low-income tracts; however, the percentage of owner-occupied units in this tract is only 0.2%. The aggregate of all HMDA lenders also did not originate any loans in this tract. Thus, the geographic distribution of home improvement loans to the low-income tract is adequate.

WesBanco made 23.0% of its home improvement loans to the moderate-income tracts, which surpassed the percentage of owner-occupied units in these tracts at 9.5%. The bank made a greater percentage of loans in these geographies than the percentage of loans made by the aggregate of all HMDA lenders at 5.9%. Thus, the geographic distribution of home improvement loans to the moderate-income tracts is excellent.

WesBanco originated 57.5% and 19.5% of its home improvement loans in middle- and upper-income tracts, respectively, compared to the percentage of owner-occupied units in these tracts at 67.4% and 23.0%. The aggregate of all HMDA lenders made 65.3% and 28.8% of their home improvement loans in the middle- and upper-income tracts.

Small Business Loans

The bank made 3.8% of its small loans to businesses in the low-income tract, which was less than the percentage of businesses in this geography at 14.4%. The bank was outperformed by the aggregate of all CRA lenders who made 12.9% of their small business in these tracts. Therefore, the geographic distribution of small loans to businesses made by WesBanco in the low-income tract is considered poor.

WesBanco originated 15.3% of its small loans to businesses in middle-income tracts, which exceeded the percentage of businesses in this tract at 13.5%. A greater percentage of loans was originated by WesBanco than those made by the aggregate of all CRA lenders at 10.9%. Therefore, the geographic distribution of small loans to businesses in the moderate-income tract is excellent.

The bank made 64.1% and 16.8% of its small loans to businesses in middle- and upper-income tracts, respectively, compared to the percentage of businesses in these tracts at 50.5% and 21.6%. The aggregate of all CRA lenders made 46.1% and 27.5% of their small loans to businesses in the middle- and upper-income tracts.

Distribution by Borrower Income and Revenue Size of the Business

The borrower distribution of loans is good, compared to excellent at the previous evaluation, as there has been a reduction in HMDA lending to low- and moderate-income borrowers.

Home Purchase Loans

The bank originated 15.4% of its home purchase loans to low-income borrowers, which was less than the percentage of low-income families at 20.2%. WesBanco made a greater percentage of home purchase loans when compared to the percentage of loans made by the aggregate of all HMDA lenders who made 12.0% of their loans to low-income borrowers. Therefore, the geographic distribution of home purchase loans to low-income borrowers is good.

WesBanco made 26.9% of its home purchase loans to moderate-income borrowers, which exceeded the percentage of moderate-income families at 17.2%. The bank originated a greater percentage of loans than the percentage of loans made by the aggregate of all HMDA lenders 22.4%. Thus, the geographic distribution of home purchase loans to moderate-income borrowers is excellent.

The bank made 22.9% and 25.1% of its home purchase loans to middle- and upper-income borrowers, respectively, as compared to the percentage of middle- and upper-income families at 20.1% and 42.5%. The aggregate of all HMDA lenders made 23.3% and 33.0% of their loans to middle- and upper-income borrowers. The borrowers' income was unavailable for 9.7% of loans made in this assessment area.

Refinance Loans

WesBanco made 7.0% of its refinance loans to low-income borrowers, which was less than the percentage of low-income families at 20.2%. The bank made a smaller percentage of loans than the aggregate of all HMDA lenders at 7.9%. Thus, the borrower distribution of refinance loans is adequate given the poverty level of 11.2%.

The bank originated 12.3% of its refinance loans to moderate-income borrowers, which was less than the percentage of moderate-income families at 17.2%. The aggregate of all HMDA lenders also made 17.2% of their loans to moderate-income borrowers. Therefore, the borrower distribution of refinance loans to moderate-income borrowers is adequate.

The bank made 33.3% and 43.9% of its refinance loans to middle- and upper-income borrowers, respectively, as compared to the percentage of middle- and upper-income families at 20.1% and 42.5%. The aggregate of all HMDA lenders made 23.2% and 40.8% of their loans to middle- and upper-income borrowers. The borrowers' income was unavailable for 3.5% of loans made in this assessment area.

Home Improvement Loans

WesBanco originated 34.5% of its home improvement loans to low-income borrowers, which exceeded the percentage of low-income families at 20.2%. The bank made a significantly higher percentage of loans than the percentage of loans made by the aggregate of all HMDA lenders at 11.9%. Thus, the borrower distribution of home improvement loans to low-income borrowers is excellent.

The bank made 32.7% of its home improvement loans to moderate-income borrowers, which surpassed the percentage of moderate-income families at 17.2%. The aggregate of all HMDA lenders made a smaller percentage of loans at 18.9% than the bank. Therefore, the borrower distribution of home improvement loans to moderate-income borrowers is excellent.

WesBanco made 13.3% of its home improvement loans to each to middle- and upper-income borrowers, as compared to the percentage of middle- and upper-income families at 20.1% and 42.5%. The aggregate of all HMDA lenders made 27.0% and 39.1% of their loans to middle- and upper-income borrowers. The borrowers' income was unavailable for 6.2% of loans made in this assessment area.

Small Business Loans

WesBanco originated 79.4% of its small business loans to businesses with less than \$1 million in revenue compared to the aggregate of all CRA lenders who originated 33.2% of total small business loans to these businesses. Businesses with less than \$1 million in revenue account for 86.5% of all businesses in the assessment area. Compared to the percentage of businesses with less than \$1 million in revenue, the bank's borrower distribution of small business loans is good.

Community Development Lending

WesBanco has made an adequate level of community development loans in the Charleston MSA. Three loans totaling \$378,000 were originated in this assessment area. One was for affordable housing, one was to an organization that serves low- and moderate-income individuals, and one was for economic development. Less than 1% of the qualified loans were in this assessment area. Since the prior period evaluation, community development loans decreased 81.2%.

Investment Test

WesBanco has made an excellent level of qualified community development investments and grants. One new investment totaling \$4,925 represents the assessment's area share of a mortgage-backed security. There were also 21 investments made in prior periods that had an unamortized balance of \$3,214,608. Further, the bank made 18 donations totaling \$29,752 to various community development organizations.

Service Test

The service test in the Charleston MSA is considered excellent. Retail and community development services are both excellent.

Retail Services

Retail delivery systems are readily accessible to the bank's geographies and individuals of different income levels in its assessment areas. WesBanco's record of opening and closing of branches has not adversely affected the accessibility of its delivery systems, particularly to low- and moderate-income individuals and/or geographies. Services do not vary in a way that inconveniences its assessment area, particularly low- and moderate-income geographies and/or individuals.

There is one branch with a cash-only ATM in a moderate-income tract. Three branches, two with full service ATMs and one with a cash-only ATM, are in middle-income tracts. One branch with an ATM is in an upper-income tract. The following table illustrates the distribution of WesBanco's offices and full service ATMs compared to the tract distribution and percentage of families in each tract.

Tract Category	Tract Distribution (%)	Percentage of Families by Tract	Percentage of Branches	Percentage of Full Service ATMs
Low	1.9	0.4	0.0	0.0
Moderate	17.3	10.4	20.0	0.0
Middle	59.6	67.1	60.0	66.7
Upper	21.2	22.1	20.0	33.3

Community Development Services

The bank is a leader in making community development services. Examples of qualified community development services include:

- *Charleston Housing Authority* – An employee counseled low- and moderate-income families on credit reports at a credit fair.
- *Community Collaborative* – This organization promotes economic development. An employee is on the board of directors.
- *Daymark* – An employee assisted in fundraising efforts for this organization, which provides services for homeless youths.
- *Greater Sissonville Development Council* – This organization promotes economic development in Sissonville, which is in a low-income tract. An employee is on the board of directors.
- *Habitat for Humanity for Kanawha and Putnam Counties* – An employee serves on the board of directors and also assisted families served by the agency with financial information and taught a class on savings.
- *Kanawha Institute for Social Research and Action* – An employee taught a class on financing and credit to low- and moderate-income individuals served by this organization.
- *Main Street West Side* – This organization promotes downtown revitalization. An employee helps with fundraising.
- *Mayor's Office of Economic Development (Charleston)* – An employee reviewed Community Development Block Grant applications.
- *Rebuilding Together* – This organization rehabilitates the homes of low-income homeowners. An employee serves on the board of directors and also advised on means to increase revenue for the organization.

METROPOLITAN AREAS

DESCRIPTION OF INSTITUTION'S OPERATIONS IN THE MORGANTOWN MSA, STATE OF WEST VIRGINIA

The Morgantown MSA represented 6.9% of WesBanco's deposits and 10.3% of loans. There are 7 branches, 1 full service ATM, and 16 cash-only ATMs in this assessment area.

This assessment area consists of Monongalia and Preston Counties, which is the entire Morgantown MSA. The two counties are in northwestern portion of the state and both border the Commonwealth of Pennsylvania to the north. The assessment area is comprised of 29 tracts: 6 moderate-, 14 middle-, and 9 upper-income tracts. There are two moderate-income tracts in the city of Morgantown itself, which is east of the Monongahela River. Another moderate-income tract is located west of the river in Monongalia County. Three moderate-income tracts are in Preston County, one in the northwestern portion and the other two are in the southern part of the county.

WesBanco ranked fifth out of ten institutions with 11.7% total deposits in the Morgantown MSA.²⁹ Other institutions having greater than 10% of the market share in this MSA included Branch Banking and Trust Company, Centra Bank, Inc., which is headquartered in Morgantown, Huntington National Bank, and Clear Mountain Bank, which is headquartered in Bruceton Mills.

A community contact was made to housing agency that serves Monongalia and Preston Counties in the Morgantown MSA and Marion and Taylor Counties, which are in the non-metropolitan West Virginia assessment area. The director indicated that there is a large amount of rental units in the city of Morgantown because of West Virginia University; however, college students have generally not displaced other residents, as many developers have built housing specifically for the students. He also noted that growth in the area has been steady and that a foreclosure crisis has mostly escaped the area. The director stated that organization has a good working relationship with all the area banks; however, they could offer the agency better rates for its operating expenses.

Population Characteristics

The population within this assessment area was 111,200 as of 2000 census. The following table illustrates population growth in the assessment area from 1990 to 2000 and 2000 to 2006³⁰:

County Name	Population Change 1990 to 2000 (%)	Population Change 2000 to 2006 (%)
Monongalia County	8.4	3.5
Preston County	1.0	3.6

²⁹ FDIC Summary of Deposits: www.fdic.gov

³⁰ USDA Economic Research: www.ers.usda.gov

The population was primarily White non-Hispanic at 93.4%, with black non-Hispanics the largest minority group at 2.8%. Asian non-Hispanics represented 2.1% of the population. Of the total population, 19.7% were age 17 years and younger, 19.3% were age 18 to 24 years, 49.2% were age 25 to 64 years, and 11.8% were age 65 and over. Since West Virginia University is in Morgantown, there is a relatively high percentage of persons aged 18 to 24 years.

Income Characteristics

The median family income for the Morgantown MSA was \$39,675, which was greater than the State of West Virginia's median family income of \$36,484. Families comprised 60.1% of the households in the assessment area. This relatively low figure can also be attributed to the large amount of students. The poverty level in this assessment area was 12.4%, which is lower than the State of West Virginia's level of 13.9%. Of the families living in the assessment area, 21.0% were low-income families, 18.5% were moderate-income families, 21.0% were middle-income families, and 39.5% were upper-income families.

Housing Characteristics

There were 50,139 housing units in this assessment area as of the 2000 census. The owner-occupancy rate was 59.8%. The percentage of rental units was 29.9% in the assessment area and was 35.6% for Monongalia County, both of which are significantly higher than the percentage of rentals in West Virginia at 21.7%. The percentage of housing units 5 with or more families was 12.0% for the assessment area and 15.1% and Monongalia County. These rates are also much higher than the percentage of multifamily units in the State of West Virginia as a whole at 6.5%. The high rental and multifamily percentages indicates that there is a large number of housing for West Virginia University students. The median age of the housing stock in the Morgantown MSA was 29 years, which was about the same of median age of housing stock in the state at 31 years.

Labor, Employment, and Economic Characteristics

According to the Bureau of Labor Statistics of the U.S. Department of Labor³¹, the 2006 annual average unemployment rate for the Morgantown MSA was 3.7%, which was lower than the nationwide average of 4.6% and ranked it 79th out of 369 MSAs in the country. The assessment area's unemployment rate was also lower than the state's rate of 4.9%. In fact, the unemployment rate in the Morgantown MSA was the lowest of the metropolitan areas in western West Virginia. The unemployment rates for the two counties in the assessment area were as follows:

Monongalia County	3.4%
Preston County	4.5%

Morgantown is the home of West Virginia University, which is the largest university in West

³¹ www.bls.gov/lau

University. The annual enrollment was approximately 26,000 in 2005. Some major employers in Monongalia County include the National Institute of Occupational Safety and Health and Mylan Pharmaceuticals, Inc.³² Other employers include Monongalia Board of Education, Monongalia General Hospital, and University Health Associates.³³ Major employers in Preston County are Kingwood Mining Company, LLC, Preston Memorial Hospital, Matthews International Corporation (a supplier of cast bronze), and Hollinee, LLC (a manufacturer of glass fibers).³⁴

Key demographic information about the assessment area can be found on the following page.

³² City of Morgantown: www.morgantown.com

³³ Regional Conditions from the Federal Reserve Bank of Richmond: www.richmondfed.org

³⁴ Preston County Economic Development Authority: www.prestonwv.com

Combined Demographics Report

WesBanco Bank

Analysis Year: 2005 & 2006

Assessment Area(s): Morgantown WV MSA 34060

Income Categories	Tract Distribution		Families by Tract Income		Families < Poverty Level as % of Families by Tract		Families by Family Income	
	#	%	#	%	#	%	#	%
Low-income	0	0.0	0	0.0	0	0.0	5,689	21.0
Moderate-income	6	20.7	5,298	19.6	899	17.0	5,001	18.5
Middle-income	14	48.3	13,165	48.6	1,735	13.2	5,682	21.0
Upper-income	9	31.0	8,603	31.8	714	8.3	10,694	39.5
Unknown-income	0	0.0	0	0.0	0	0.0	0	0.0
Total Assessment Area	29	100.0	27,066	100.0	3,348	12.4	27,066	100.0
	Housing Units by Tract	Housing Types by Tract						
		Owner-Occupied			Rental		Vacant	
		#	%	%	#	%	#	%
Low-income	0	0	0.0	0.0	0	0.0	0	0.0
Moderate-income	10,486	5,700	19.0	54.4	3,622	34.5	1,164	11.1
Middle-income	23,462	14,577	48.6	62.1	6,131	26.1	2,754	11.7
Upper-income	16,191	9,721	32.4	60.0	5,239	32.4	1,231	7.6
Unknown-income	0	0	0.0	0.0	0	0.0	0	0.0
Total Assessment Area	50,139	29,998	100.0	59.8	14,992	29.9	5,149	10.3
	Total Businesses by Tract		Businesses by Tract & Revenue Size					
			Less Than or = \$1 Million		Over \$1 Million		Revenue Not Reported	
			#	%	#	%	#	%
Low-income	0	0.0	0	0.0	0	0.0	0	0.0
Moderate-income	799	24.4	708	25.0	63	18.2	28	29.2
Middle-income	1,314	40.1	1,135	40.0	138	39.9	41	42.7
Upper-income	1,163	35.5	991	35.0	145	41.9	27	28.1
Unknown-income	0	0.0	0	0.0	0	0.0	0	0.0
Total Assessment Area	3,276	100.0	2,834	100.0	346	100.0	96	100.0
Percentage of Total Businesses:			86.5		10.6		2.9	
	Total Farms by Tract		Farms by Tract & Revenue Size					
			Less Than or = \$1 Million		Over \$1 Million		Revenue Not Reported	
			#	%	#	%	#	%
Low-income	0	0.0	0	0.0	0	0.0	0	0.0
Moderate-income	45	47.9	44	47.8	1	100.0	0	0.0
Middle-income	40	42.6	39	42.4	0	0.0	1	100.0
Upper-income	9	9.6	9	9.8	0	0.0	0	0.0
Unknown-income	0	0.0	0	0.0	0	0.0	0	0.0
Total Assessment Area	94	100.0	92	100.0	1	100.0	1	100.0
Percentage of Total Farms:			97.9		1.1		1.1	

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

Lending Test

WesBanco's performance under the lending test for this assessment area is excellent. Lending is reasonably distributed among the different tract levels, especially to moderate-income geographies. Lending to borrowers of different income levels and small businesses is good. Community development loans greatly increased from the previous evaluation and enhanced the bank's performance.

Lending Activity

Lending activity reflects an excellent responsiveness to assessment area credit needs given the size of this market.

The bank made \$72.2 million in loans in the Morgantown MSA in the evaluation period. This represented 10.3% of WesBanco's lending activity. The percentage of loans is more than both the percentage of offices and the percentage of deposits in the assessment area at 9.0% and 6.9%, respectively. WesBanco ranked sixth of 196 HMDA reporters and eighth of 38 CRA reporters in the Morgantown MSA.

Geographic Distribution

The geographic distribution of loans in this assessment area is good, which is the same as the prior period evaluation. HMDA lending is good, while small business lending is adequate.

There were no significant lending gaps in the assessment area. No HMDA lending activity occurred in 1 of the 6 (16.7%) moderate-income tracts, while no CRA lending occurred in 2 of the 14 middle-income tracts (14.3%).

Home Purchase Loans

WesBanco made 17.9% of its home purchase loans in moderate-income tracts, which was less than the percentage of owner-occupied units in these tracts at 19.0%. The bank made a greater percentage of loans than loans made by the aggregate of all HMDA lenders at 13.7%. Therefore, the geographic distribution of home purchase loans to moderate-income tracts is good.

The bank made 48.8% and 33.3% of its home purchase loans in middle- and upper-income tracts, respectively, compared to the percentage of owner-occupied units in these geographies at 48.6% and 32.4%. The aggregate of all HMDA lenders originated 36.5% and 49.8% of their home purchase loans in these tracts.

Refinance Loans

The bank originated 12.6% of its refinance loans in moderate-income tracts, which was less than the percentage of owner-occupied units in these tracts at 19.0%. A smaller percentage of loans was originated in these tracts than the percentage of loans made by the aggregate of all HMDA lenders at 15.2%. Thus, the geographic distribution of refinance loans to moderate-income tracts is adequate.

The bank made 53.4% and 34.0% of its refinance loans in middle- and upper-income tracts, respectively, compared to the percentage of owner-occupied units in these geographies at 48.6% and 32.4%. The aggregate of all HMDA lenders originated 44.4% and 39.9% of their refinance loans in these tracts.

Home Improvement Loans

WesBanco made 16.8% of its home improvement loans in moderate-income tracts, which was less than the percentage of owner-occupied units in these tracts at 19.0%. A smaller percentage of loans was made in these tracts than the percentage of loans originated by the aggregate of all HMDA lenders at 17.7%. Therefore, the geographic distribution of home improvement loans is good.

WesBanco originated 66.4% and 16.8% of its home improvement loans in middle- and upper-income tracts, respectively, compared to the percentage of owner-occupied units in these geographies at 48.6% and 32.4%. The aggregate of all HMDA lenders originated 47.0% and 34.3% of their home improvement loans in these tracts.

Small Business Loans

The bank originated 15.7% of its loans to small businesses in moderate-income tracts, which was less than the percentage of businesses in these tracts at 24.4% and the percentage of loans made by the aggregate of all CRA lenders at 18.0%. Thus, the geographic distribution of loans to small businesses in moderate-income tracts is adequate.

WesBanco made 59.1% and 25.2% of its small loans to businesses in middle- and upper-income tracts, respectively, compared to the percentage of businesses these geographies at 40.1% and 35.5%. The aggregate of all CRA lenders originated 38.2% and 38.4% of their small loans to businesses in these tracts.

Distribution by Borrower Income and Revenue Size of the Business

Borrower distribution is good, while it was excellent for the prior period evaluation. HMDA lending to low-income borrowers has decreased from that time.

Home Purchase Loans

WesBanco originated 9.5% of its home purchase loans to low-income borrowers, which was less than the percentage of low-income families at 21.0%. A greater percentage of loans was made to low-income borrowers than the percentage of loans made by the aggregate of all HMDA lenders at 4.4%. Therefore, the borrower distribution of home purchase loans to low-income borrowers is adequate given the bank made a higher percentage of loans to low-income borrowers than its competitors and the poverty level of 12.4%

The bank made 16.4% of its home purchase loans to moderate-income borrowers, which was less than the percentage of moderate-income families at 18.5%. A greater percentage of loans was made to moderate-income borrowers than the percentage of loans made by the aggregate of all HMDA lenders at 11.8%. Thus, the borrower distribution of home purchase loans to moderate-income borrowers is good.

WesBanco made 16.4% and 47.3% of its home purchase loans to middle- and upper-income borrowers, respectively, as compared to the percentage of middle- and upper-income families at 21.0% and 39.5%. The aggregate of all HMDA lenders made 19.7% and 47.8% of their loans to middle- and upper-income borrowers. The borrowers' income was not available for 10.4% of the home purchase loans made in this assessment area.

Refinance Loans

The bank made 6.8% of its refinance loans to low-income borrowers, which was less than the percentage of low-income families at 21.0%. A greater percentage of loans was made to low-income borrowers than the percentage of loans made by the aggregate of all HMDA lenders at 5.1%. Thus, the borrower distribution of refinance loans to low-income borrowers is adequate when taking into consideration the poverty rate and because the bank made a higher percentage of loans than the aggregate of all HMDA lenders.

WesBanco originated 19.4% of its refinance loans to moderate-income borrowers, which surpassed the percentage of moderate-income families at 18.5%. A greater percentage of loans was made to moderate-income borrowers than the percentage of loans made by the aggregate of all HMDA lenders at 15.6%. Therefore, the borrower distribution of refinance loans to moderate-income borrowers is excellent.

The bank made 26.2% and 41.7% of its refinance loans to middle- and upper-income borrowers, respectively, as compared to the percentage of middle- and upper-income families at 21.0% and 39.5%. The aggregate of all HMDA lenders made 21.5% and 43.5% of their loans to middle- and upper-income borrowers. The borrowers' income was not available for 5.8% of the refinance loans made in this assessment area.

Home Improvement Loans

WesBanco made 30.8% of its home improvement loans to low-income borrowers, which was greater than the percentage of low-income families at 21.0%. The bank surpassed the percentage of lending by the aggregate of all HMDA lenders who made 8.2% of refinance loans to low-income borrowers. Therefore, the borrower distribution of home improvement loans to low-income borrowers is excellent.

The bank originated 45.5% of its home improvement loans to moderate-income borrowers, which was significantly greater than the percentage of moderate-income families at 18.5%. A greater percentage of loans was made to moderate-income borrowers than the percentage of loans made by the aggregate of all HMDA lenders at 17.7%. Thus, the borrower distribution of home improvement loans to moderate-income borrowers is excellent.

WesBanco made 8.4% and 10.5% of its home improvement loans to middle- and upper-income borrowers, respectively, as compared to the percentage of middle- and upper-income families at 21.0% and 39.5%. The aggregate of all HMDA lenders made 26.4% and 44.5% of their loans to middle- and upper-income borrowers. The borrowers' income was not available for 4.9% of the home improvement loans made in this assessment area.

Small Business Loans

WesBanco originated 82.2% of its small business loans to businesses with less than \$1 million in revenue compared to the aggregate of all CRA lenders who originated 41.9% of total small business loans to these businesses. Businesses with less than \$1 million in revenue account for 86.5% of all businesses in the assessment area. Compared to the percentage of businesses with less than \$1 million in revenue, the bank's borrower distribution of small business loans is good.

Community Development Lending

WesBanco has made an excellent level of community development loans in this assessment area. The bank originated eight qualified loans totaling \$922,200 during the evaluation period. Two loans were to provide affordable housing for low- and moderate-income individuals while six were for services directed toward low- and moderate-income individuals. Approximately 1.0% of qualified community development loans were made in this assessment area. Community development loans increased 105.5% since the prior period evaluation.

Investment Test

WesBanco has made an excellent level of qualified community development investments and grants. The one new investment of \$6,743 represents the assessment area's share of a mortgage-backed security. There were also 20 investments made in prior periods that had an outstanding balance of \$3,764,624 as of year-end 2006. Further, WesBanco made 14 donations totaling \$63,478 to various community development organizations.

Service Test

The service test in the Morgantown MSA is considered excellent. Both retail and community development services are excellent.

Retail Services

Retail delivery systems are readily accessible to the bank's geographies and individuals of different income levels in its assessment areas. WesBanco's record of opening and closing of branches has not adversely affected the accessibility of its delivery systems, particularly to low- and moderate-income individuals and/or geographies. Services do not vary in a way that inconveniences its assessment area, particularly low- and moderate-income geographies and/or individuals.

There are three cash-only ATMs in moderate-income tracts in Morgantown. Two branches with cash-only ATMs are also in moderate-income geographies, one is in Morgantown and the other is in Masontown in Preston County. In the middle-income tracts, there are two branches with cash-only ATMs, one branch with a full service ATM, and four cash-only ATMs. All of banking facilities in the upper-income tracts are in Morgantown with two offices with cash-only ATMs and three cash-only ATMs in these geographies. The following table illustrates the distribution of WesBanco's offices and full service ATMs in the Morgantown MSA compared to the tract distribution and percentage of families in each tract.

Tract Category	Tract Distribution (%)	Percentage of Families by Tract	Percentage of Branches	Percentage of Full Service ATMs
Low	0.0	0.0	0.0	0.0
Moderate	20.7	19.6	28.6	0.0
Middle	48.3	48.6	42.9	100.0
Upper	31.0	31.8	28.6	0.0

In 2005, the bank relocated its office in Kingwood with the same middle-income tract. The relocation was effected to combine a stand-alone drive-through facility with an existing nearby office that did not have a drive-through. The office was relocated to a new facility with an attached drive-through.

Community Development Services

WesBanco is a leader in making community development services. Examples of qualified community services include the following:

- *Camp Dawson, Victims of Hurricane Katrina* – An employee helped displaced victims of the hurricane obtain debit cards and disaster relief.
- *Habitat for Humanity – Monongalia County* – An employee assisted with fundraising for the organization.

- *I-79 Development Council* – A bank employee serves on the board of directors for this organization, which promotes economic development of the I-79 corridor in north central West Virginia.
- *Kingwood Water Works* – An employee serves on the board and assisted with financial information to improve drinking water to several moderate-income areas.
- *Morgantown Area Economic Partnership* – This organization promotes economic development in Monongalia and Preston Counties. An employee is on the board of directors.
- *Preston County Sheltered Workshop* – This organization offers job training to disabled persons, a majority of which are low- and moderate-income. An employee is on the board of directors.
- *Scott's Run Settlement House* – An employee provided several financial training sessions to students and adults which were mostly low- and moderate-income individuals.

NON-METROPOLITAN STATEWIDE AREAS³⁵

DESCRIPTION OF INSTITUTION'S OPERATIONS IN THE NONMETROPOLITAN AREA, STATE OF WEST VIRGINIA

The non-metropolitan area is second in terms of the percentage of both deposits and loans at offices for a single area. There are also five full service and eight cash-only ATMs in this assessment area.

The assessment area consists of Harrison, Marion, Tyler, and Wetzel Counties. These counties are in the northwestern portion of the state and are south of Wheeling, east of Parkersburg, and west of Morgantown. The largest cities in this area are Fairmont in Marion County, and Clarksburg in Harrison County. The assessment area is comprised of 46 tracts: 3 moderate-, 30 middle-, and 13 upper-income tracts. There is one moderate-income tract in Clarksburg and two in Fairmont. Three middle-income tracts in Wetzel County were considered distressed because of high unemployment rates.

This assessment area has changed significantly since the previous examination. The sale of four branches to Union Bank, Inc. signaled WesBanco's exit from Ritchie County. When the Office of the Management and Budget re-designated metropolitan statistical areas in 2003, Pleasants and Wirt Counties were added to the Parkersburg-Marietta MSA, while Monongalia and Preston Counties became part of the newly created Morgantown MSA.³⁶ Finally, Jackson County is now its own assessment area because its neighboring counties are either not in the bank's assessment area or are in a multi-state MSA.

WesBanco ranked first of 18 institutions for total deposits in the four counties in this assessment area with 21.4% of deposits.³⁷ Other institutions having greater than 10% of the market share included Huntington National Bank, Branch Banking and Trust Company, and JPMorgan Chase Bank, National Association.

Two community contacts were made in this assessment area given its relative size. The first one,

³⁵ The discussion of an institution's CRA performance within a nonmetropolitan statewide area is only required for institutions with branches in two or more states. A separate discussion of CRA performance within a nonmetropolitan statewide area for intrastate banks that have branches in metropolitan and nonmetropolitan areas is optional because the performance in the nonmetropolitan areas have been reviewed and discussed in the overall evaluation of the institution. Examiners may wish to discuss in greater detail, however, the assessment areas within nonmetropolitan areas that were reviewed using a full-scope review for intrastate banks with branches in metropolitan and nonmetropolitan areas or for intrastate banks with branches only in nonmetropolitan areas.

³⁶ The August 1, 2005 performance evaluation encompassed both 2003 and 2004. The assessment areas for 2003 were delineated according to the 1999 MSA definitions while the assessment areas were changed for 2004 based on the 2003 MSA definitions.

³⁷ FDIC Summary of Deposits: www.fdic.gov

which was discussed in the Morgantown MSA portion of this evaluation, indicated that many light industries and small businesses have left the Fairmont area. Since the city and its surrounding area are located between two growing regions, Morgantown and Clarksburg, local government and realtors have marketed Fairmont as a bedroom community. Average housing prices in Fairmont are much lower than in these two other cities.

The other contact related to economic development initiative in Marion County that targets high-tech businesses. The contact indicated that the economy in the area has stabilized as high-tech jobs have been created in the area, specifically from the FBI and Lockheed Martin. Coal mining continues to decline. The contact stated that few financial institutions are large enough to serve the organization's needs; however, WesBanco has provided financial support to economic development.

Population Characteristics

The population within this assessment area was 152,535 as of 2000 census. The following table illustrates population growth in the assessment area from 1990 to 2000 and 2000 to 2006³⁸:

County Name	Population Change 1990 to 2000 (%)	Population Change 2000 to 2006 (%)
Harrison	-1.0	0.1
Marion	-1.1	0.2
Tyler	-2.1	-3.4
Wetzel	-8.1	-5.7

The population was primarily White non-Hispanic at 95.8%, with black non-Hispanics the largest minority group at 2.1%. Of the total population, 22.3% were age 17 years and younger, 8.9% were age 18 to 24 years, 51.9% were age 25 to 64 years, and 17.0% were age 65 and over.

Income Characteristics

The median family income for this assessment area was \$36,940, which was slightly higher than the State of West Virginia's median family income of \$36,484. Families comprised 68.3% of the households in the assessment area. The poverty level in this assessment area was 13.0%, which was slightly lower than West Virginia's level of 13.9%. Of the families living in the assessment area, 17.1% were low-income families, 16.1% were moderate-income families, 19.6% were middle-income families, and 47.3% were upper-income families.

Housing Characteristics

³⁸ USDA Economic Research: www.ers.usda.gov

As of the 2000 census, there were 70,865 housing units in the assessment area, of which 66.8% were owner-occupied. Most of the units (82.5%) housed 1-4 families, while 5.3% housed 5 families or more and 12.2% were mobile homes. About half (49.3%) of the units in the moderate-income tracts were rental properties. The vacancy rate in the moderate-income tracts at 16.5% exceeded the overall vacancy rates West Virginia of 12.8%. The median age of the housing stock was 44 years, which was higher than the median age of housing stock in West Virginia of 31 years.

Labor, Employment, and Economic Characteristics

The 2006 average unemployment rate for the four counties in this assessment area was as follows³⁹:

Harrison County	4.7%
Marion County	4.4%
Tyler County	7.2%
Wetzel County	8.2%

The average employment rate for the four counties combined was 5.1%. In comparison to the state's rate of 4.9%, only Harrison and Marion Counties were lower than West Virginia's rate as a whole.

Major employees in Harrison County include Consolidation Coal Company, Dominion Transmission, Inc., Pratt and Whitney Engine Services, Inc., and United Hospital Center, Inc. Some of the large employers in Marion County are Aegis Communications Group, Inc., Allegheny Energy Service Corporation, Eastern Associated Coal Company, and Fairmont State College. In Tyler County, major employers include Alumitech of West Virginia, Inc., GE Silicones West Virginia, LLC, Ormet Aluminum Mill Production Corporation, and Sprouse Building Products, Inc. Some of the large employers in Wetzel County are Harris Masonry, Inc., New Martinsville Supply Company, Inc. (a supplier of tools), and Wetzel County Board of Education.⁴⁰

Key demographic information about the assessment area is found in the following table.

³⁹ www.bls.gov/lau

⁴⁰ Regional Conditions from the Federal Reserve Bank of Richmond: www.richmondfed.org

Combined Demographics Report

WesBanco Bank

Analysis Year: 2005 & 2006

Assessment Area(s): WV Non-MSA

Income Categories	Tract Distribution		Families by Tract Income		Families < Poverty Level as % of Families by Tract		Families by Family Income	
	#	%	#	%	#	%	#	%
Low-income	0	0.0	0	0.0	0	0.0	7,297	17.1
Moderate-income	3	6.5	1,363	3.2	357	26.2	6,865	16.1
Middle-income	30	65.2	28,494	66.7	4,161	14.6	8,386	19.6
Upper-income	13	28.3	12,893	30.2	1,057	8.2	20,202	47.3
Unknown-income	0	0.0	0	0.0	0	0.0	0	0.0
Total Assessment Area	46	100.0	42,750	100.0	5,575	13.0	42,750	100.0
	Housing Units by Tract	Housing Types by Tract						
		Owner-Occupied		Rental		Vacant		
		#	%	#	%	#	%	
Low-income	0	0.0	0	0.0	0	0.0	0	0.0
Moderate-income	3,444	1,179	2.5	34.2	1,698	49.3	567	16.5
Middle-income	46,993	31,556	66.7	67.2	9,628	20.5	5,809	12.4
Upper-income	20,428	14,600	30.8	71.5	3,858	18.9	1,970	9.6
Unknown-income	0	0	0.0	0.0	0	0.0	0	0.0
Total Assessment Area	70,865	47,335	100.0	66.8	15,184	21.4	8,346	11.8
	Total Businesses by Tract	Businesses by Tract & Revenue Size						
		Less Than or = \$1 Million		Over \$1 Million		Revenue Not Reported		
		#	%	#	%	#	%	
Low-income	0	0.0	0	0.0	0	0.0	0	0.0
Moderate-income	348	8.9	312	9.2	28	7.1	8	5.7
Middle-income	2,112	53.8	1,814	53.5	206	52.4	92	65.7
Upper-income	1,464	37.3	1,265	37.3	159	40.5	40	28.6
Unknown-income	0	0.0	0	0.0	0	0.0	0	0.0
Total Assessment Area	3,924	100.0	3,391	100.0	393	100.0	140	100.0
Percentage of Total Businesses:			86.4		10.0		3.6	
	Total Farms by Tract	Farms by Tract & Revenue Size						
		Less Than or = \$1 Million		Over \$1 Million		Revenue Not Reported		
		#	%	#	%	#	%	
Low-income	0	0.0	0	0.0	0	0.0	0	0.0
Moderate-income	0	0.0	0	0.0	0	0.0	0	0.0
Middle-income	49	69.0	49	69.0	0	0.0	0	0.0
Upper-income	22	31.0	22	31.0	0	0.0	0	0.0
Unknown-income	0	0.0	0	0.0	0	0.0	0	0.0
Total Assessment Area	71	100.0	71	100.0	0	0.0	0	0.0
Percentage of Total Farms:			100.0		0.0		0.0	

CONCLUSIONS WITH RESPECT TO PERFORMANCE TESTS IN THE WEST VIRGINIA STATEWIDE NONMETROPOLITAN AREA

Lending Test

WesBanco's performance under the lending test for this assessment area is excellent. Loans to different income tracts are reasonably dispersed, especially to low- and moderate-income geographies, and lending to low- and moderate income borrowers and small businesses is good. Community development loans continued to grow despite the reduction of the size of this assessment area and enhanced the bank's lending performance.

Lending Activity

Lending activity reflects an excellent responsiveness to assessment area credit needs given this a major market for the bank.

The bank made \$107.7 million in loans in the assessment area in the evaluation period. This represented 17.5% of WesBanco's lending activity. The percentage of loans is less than the percentage of offices at 19.2%, but more than the percentage of deposits in this assessment area at 13.5%. WesBanco ranked second of 174 HMDA reporters and sixth of 41 CRA reporters in the West Virginia non-metropolitan area.

Geographic Distribution

The geographic distribution of loans in this assessment area is good, while it was excellent at the prior period evaluation. The percentage of HMDA and CRA loans has decreased in moderate-income tracts.

Home Purchase Loans

WesBanco made 1.9% of its home purchase loans in the moderate-income tracts, which was less than the percentage of owner-occupied units in these geographies at 2.5%. A smaller percentage of loans was made than the percentage of loans made by the aggregate of all HMDA lenders at 4.9%. Thus, the geographic distribution of home purchase loans to the moderate-income tracts is good.

The bank originated 43.7% and 54.4% of its home purchase loans in the middle- and upper-income tracts, respectively, compared to the percentage of owner-occupied units in these geographies of 66.7% and 30.8%. The aggregate of all HMDA lenders made 49.2% and 45.9% of their loans in the middle- and upper-income tracts.

Refinance Loans

The bank made 3.9% of its refinance loans in the moderate-income tracts, which surpassed the percentage of owner-occupied units in these tracts at 2.5%. The bank made a greater percentage of loans in these geographies than the 3.6% made by the aggregate of all HMDA lenders. Therefore, the geographic distribution of refinance loans to the moderate-income tracts is excellent.

WesBanco originated 49.4% and 46.7% of its refinance loans in the middle- and upper-income tracts, respectively, compared to the percentage of owner-occupied units in these geographies of 66.7% and 30.8%. The aggregate of all HMDA lenders made 55.3% and 41.1% of their loans in the middle- and upper-income tracts.

Home Improvement Loans

The bank originated 2.4% of its home improvement loans in the moderate-income tracts, which was comparable to the percentage of owner-occupied units in these tracts at 2.5%. The bank was surpassed by the aggregate of all HMDA lenders who made 4.2% of their home improvement loans in these geographies. Thus, the geographic distribution of home improvement loans to the moderate-income tracts is good.

WesBanco made 71.4% and 26.2% of its home improvement loans in the middle- and upper-income tracts, respectively, compared to the percentage of owner-occupied units in these geographies of 66.7% and 30.8%. The aggregate of all HMDA lenders made 56.0% and 39.8% of their loans in the middle- and upper-income tracts.

Small Business Loans

WesBanco originated 4.2% of its small loans to businesses in the moderate-income tracts, which was less than the percentage of businesses in these tracts at 8.9%. The aggregate of all CRA lenders made 8.9% of their loans in these geographies. Therefore, the geographic distribution of small loans to businesses in moderate-income tracts is poor

The bank made 42.8% and 53.0% of its small loans to businesses in the middle- and upper-income tracts, respectively, compared to the percentage businesses in these geographies of 53.8% and 37.3%. The aggregate of all lenders made 44.6% and 37.8% of their loans in the middle- and upper-income tracts.

Distribution by Borrower Income and Revenue Size of the Business

The borrower distribution is also good, while it was excellent at the prior period evaluation. Declines were noted in the percentage of HMDA loans made to low- and moderate-income borrowers and loans to small businesses.

Home Purchase Loans

WesBanco made 7.2% of its home purchase loans to low-income borrowers, which is less than the percentage of low-income families at 17.1%. The bank outperformed the aggregate of all HMDA lenders who made 4.8% of home purchase loans to these borrowers. Thus, the borrower distribution of home purchase loans to low-income borrowers is adequate given the poverty level of 13.0% and the fact that the bank made a significantly higher percentage of loans than the aggregate of all HMDA lenders.

The bank originated 16.4% of its home purchase loans to moderate-income borrowers, which is comparable to the percentage of moderate-income families at 16.1%. The bank again surpassed the aggregate of all HMDA lenders who made 13.0% of its loans to moderate-income borrowers. Therefore, the borrower distribution of home purchase loans to moderate-income borrowers is excellent.

WesBanco made 23.8% and 48.4% of its home purchase loans to middle- and upper-income borrowers, respectively, compared to the percentage of middle- and upper-income families at 19.6% and 47.3%. The aggregate of all HMDA lenders made 22.0% and 47.9% of their loans to middle- and upper-income borrowers. The borrowers' income was not available for 4.2% of the loans made in this assessment area.

Refinance Loans

The bank originated 3.9% of its refinance loans to low-income borrowers, which was less than the percentage of low-income families at 17.1%. A smaller percentage of loans was made to low-income borrowers than the percentage of loans made by the aggregate of all HMDA lenders at 5.9%. Thus, the borrower distribution of refinance loans to low-income borrowers is poor.

WesBanco made 10.0% of its refinance loans to moderate-income borrowers, which was less than the percentage of moderate-income families at 16.1%. A smaller percentage of loans was made to moderate-income borrowers than the percentage of loans made by the aggregate of all HMDA lenders at 13.0%. Therefore, the borrower distribution of refinance loans to moderate-income borrowers is adequate.

The bank made 17.8% and 58.3% of its refinance loans to middle- and upper-income borrowers, respectively, compared to the percentage of middle- and upper-income families at 19.6% and 47.3%. The aggregate of all HMDA lenders made 20.9% and 50.1% of their loans to middle- and upper-income borrowers. The borrowers' income was not available for 10.1% of the loans made in this assessment area.

Home Improvement Loans

WesBanco made 34.7% of its home improvement loans to low-income borrowers, which was significantly more than the percentage of low-income families at 17.1%. The bank outperformed the aggregate of all HMDA lenders who made 6.6% of their home improvement loans to low-income borrowers. Thus, the borrower distribution of home improvement loans to low-income borrowers is excellent.

The bank originated 40.3% of its home improvement loans to moderate-income borrowers, which was also significantly higher than the percentage of moderate-income families at 16.1%. WesBanco made higher percentage of loans to moderate-income borrowers than the percentage of loans made by the aggregate of all HMDA lenders at 18.6%. Therefore, the borrower distribution of home improvement loans to moderate-income borrowers is excellent.

The bank made 5.2% and 15.3% of its home improvement loans to middle- and upper-income borrowers, respectively, compared to the percentage of middle- and upper-income families at 19.6% and 47.3%. The aggregate of all HMDA lenders made 20.4% and 52.4% of their loans to middle- and upper-income borrowers. The borrowers' income was not available for 4.4% of the loans made in this assessment area.

Small Business Loans

WesBanco originated 74.5% of its small business loans to businesses with less than \$1 million in revenue compared to the aggregate of all CRA lenders who originated 35.5% of total small business loans to these businesses. Businesses with less than \$1 million in revenue account for 86.4% of all businesses in the assessment area. Compared to the percentage of businesses with less than \$1 million in revenue, the bank's borrower distribution of small business loans is good.

Community Development Lending

WesBanco has made an excellent level of community development loans in this assessment area. The bank originated 15 loans totaling \$9,162,755 during the evaluation period, of which 11 were for organizations that provide services to low- and moderate-income individuals, 1 was for economic development, and three were to revitalize and stabilize low-, moderate-, or distressed middle-income tracts. This assessment area represented the third highest for community development loans at 9.9%. Although the assessment area was more than cut in half due to MSA changes and branch sales, the bank still increased the percentage of loans made in this assessment area by 15.2%.

Investment Test

WesBanco has made an excellent level of qualified community development investments and grants. The one new investment equaling \$12,324 equals the assessment area's share of a mortgage-backed security. There were 18 investments with unamortized balances totaling \$3,416,299. Further, WesBanco made 13 donations equaling \$5,853 to various community development organizations.

Service Test

The service test in the assessment area is considered excellent. Retail and community development services are both excellent.

Retail Services

Retail delivery systems are readily accessible to the bank's geographies and individuals of different income levels in its assessment areas. WesBanco's record of opening and closing of branches has not adversely affected the accessibility of its delivery systems, particularly to low- and moderate-income individuals and/or geographies. Services do not vary in a way that inconveniences its assessment area, particularly low- and moderate-income geographies and/or individuals.

In March 2006, WesBanco sold its four offices in Ritchie County to Union Bank, Inc. in Middlebourne. These four branches, which were in Cairo, Ellenboro, Harrisville, and Pennsboro, are all located in underserved and/or distressed middle-income tracts. This sale did not negatively impact banking services in the assessment area, as these offices remained open after the sale.

There is a branch with an ATM in a moderate-income tract, which is located in Fairmont. In the middle-income tracts, there are eight offices: five have cash-only ATMs, two have a full service ATM, and one does not have an ATM. There is also a cash-only ATM in a middle-income geography. Six offices are in upper-income tracts, including three with full service ATMs, two without ATMs, and one with a cash-only ATM. A cash-only ATM is also in an upper-income tract. The following table illustrates the distribution of offices and full service ATMs compared to the tract distribution and percentage of families in each tract.

Tract Category	Tract Distribution (%)	Percentage of Families by Tract	Percentage of Branches	Percentage of Full Service ATMs
Low	0.0	0.0	0.0	0.0
Moderate	6.5	3.2	6.7	20.0
Middle	65.2	66.7	53.3	20.0
Upper	28.3	30.2	40.0	60.0

Community Development Services

The bank is a leader in making community development services. Examples of qualified community development services are as follows:

- *Bi-County Nutrition Program* – Two employees gave presentations on identity theft to low- and moderate-income senior citizens.
- *City of Paden* – The city is in a distressed middle-income tract. An employee serves as a co-chair of the finance committee.
- *Clarksburg League for Service* – An employee is the finance committee chairman for this organization, which provides medical services to low- and moderate-income women and children.
- *Criss Cross* – This organization provides referral programs, child care, emergency financial and food assistance, and transportation to low- and moderate-income individuals. An employee provides budgeting services and was president of the board of directors.
- *Fairmont Community Development Partnership* – This is a city agency that promotes economic development, neighborhood revitalization, and affordable housing in Fairmont, which is mostly made of moderate-income tracts. An employee is on the board of directors and also served as treasurer while another completed an application for Federal Home Loan Bank funding.
- *Fairmont/Morgantown Housing Authority* – This organization provides affordable housing to low- and moderate-income individuals in Monongalia, Marion, Taylor, and Preston Counties. One employee discussed affordable housing opportunities and two others provided training at monthly homebuyer education classes.
- *Greater New Martinsville Development Corporation* – An employee is on the board of directors and is treasurer for this organization, which promotes economic development through maintaining and expanding employment opportunities in Wetzel County.
- *Harrison County Housing Authority* – An employee is on the board of directors and also is the chairman of the budget committee of this agency, which promotes affordable housing.
- *Opportunities Industrialization Centers of Marion County* – One employee is on the board of directors and also conducted mock job interviews and taught financial skills while another provided financial education to an adult class. This organization offers job training to unemployed workers and low- and moderate-income individuals.
- *Tyler County Development Authority* – An employee is treasurer and a board member of this agency, which helps to prevent unemployment and rehabilitate underdeveloped or decaying areas.

NON-METROPOLITAN STATEWIDE AREAS⁴¹
(limited scope review)

DESCRIPTION OF INSTITUTION'S OPERATIONS IN JACKSON COUNTY NON-METROPOLITAN, STATE OF WEST VIRGINIA

The Jackson County non-metropolitan assessment area represented 1.7% of WesBanco's deposits and 1.4% of its loans. There is one office in this county.

Jackson County is located in the western portion of the state along the Ohio River. Ripley is the county seat and the largest city is Ravenswood, with a population of approximately 4,000. The county consists of six tracts: four middle- and two upper-income tracts. The one office in this county has a cash-only ATM and is located in a middle-income tract.

Since the previous examination, an office in a grocery store in Ripley was closed. The office was in a middle-income tract.

As of June 30, 2006, WesBanco ranked 5th out of 7 institutions in Jackson County with 13.5% of total deposits.⁴² Major competitors in the county included Branch Banking and Trust Company, JPMorgan Chase Bank, National Association, United Bank, City National Bank of West Virginia, which is headquartered in Charleston, and Huntington National Bank.

Key demographic information about the assessment area can be found in the following table.

41 The discussion of an institution's CRA performance within a nonmetropolitan statewide area is only required for institutions with branches in two or more states. A separate discussion of CRA performance within a nonmetropolitan statewide area for intrastate banks that have branches in metropolitan and nonmetropolitan areas is optional. Examiners may wish to discuss in greater detail, however, the assessment areas within the nonmetropolitan areas that were reviewed using a full-scope review for intrastate banks with branches in metropolitan and nonmetropolitan areas or for intrastate banks with branches only in nonmetropolitan areas.

42 FDIC Summary of Deposits: www.fdic.gov

Combined Demographics Report

WesBanco Bank

Analysis Year: 2005 & 2006

Assessment Area(s): Jackson County WV Non-MSA

Income Categories	Tract Distribution		Families by Tract Income		Families < Poverty Level as % of Families by Tract		Families by Family Income	
	#	%	#	%	#	%	#	%
Low-income	0	0.0	0	0.0	0	0.0	1,327	16.1
Moderate-income	0	0.0	0	0.0	0	0.0	1,236	15.0
Middle-income	4	66.7	6,291	76.5	812	12.9	1,668	20.3
Upper-income	2	33.3	1,931	23.5	195	10.1	3,991	48.5
Unknown-income	0	0.0	0	0.0	0	0.0	0	0.0
Total Assessment Area	6	100.0	8,222	100.0	1,007	12.2	8,222	100.0
	Housing Units by Tract	Housing Types by Tract						
		Owner-Occupied			Rental		Vacant	
		#	%	%	#	%	#	%
Low-income	0	0	0.0	0.0	0	0.0	0	0.0
Moderate-income	0	0	0.0	0.0	0	0.0	0	0.0
Middle-income	9,531	6,717	76.3	70.5	1,873	19.7	941	9.9
Upper-income	2,714	2,082	23.7	76.7	389	14.3	243	9.0
Unknown-income	0	0	0.0	0.0	0	0.0	0	0.0
Total Assessment Area	12,245	8,799	100.0	71.9	2,262	18.5	1,184	9.7
	Total Businesses by Tract		Businesses by Tract & Revenue Size					
			Less Than or = \$1 Million		Over \$1 Million		Revenue Not Reported	
			#	%	#	%	#	%
Low-income	0	0.0	0	0.0	0	0.0	0	0.0
Moderate-income	0	0.0	0	0.0	0	0.0	0	0.0
Middle-income	644	88.1	564	88.7	61	82.4	19	90.5
Upper-income	87	11.9	72	11.3	13	17.6	2	9.5
Unknown-income	0	0.0	0	0.0	0	0.0	0	0.0
Total Assessment Area	731	100.0	636	100.0	74	100.0	21	100.0
Percentage of Total Businesses:			87.0		10.1		2.9	
	Total Farms by Tract		Farms by Tract & Revenue Size					
			Less Than or = \$1 Million		Over \$1 Million		Revenue Not Reported	
			#	%	#	%	#	%
Low-income	0	0.0	0	0.0	0	0.0	0	0.0
Moderate-income	0	0.0	0	0.0	0	0.0	0	0.0
Middle-income	34	89.5	34	89.5	0	0.0	0	0.0
Upper-income	4	10.5	4	10.5	0	0.0	0	0.0
Unknown-income	0	0.0	0	0.0	0	0.0	0	0.0
Total Assessment Area	38	100.0	38	100.0	0	0.0	0	0.0
Percentage of Total Farms:			100.0		0.0		0.0	

CONCLUSIONS WITH RESPECT TO PERFORMANCE TESTS IN THE JACKSON COUNTY NON-METROPOLITIAN, STATE OF WEST VIRGINIA

The geographic distribution of loans is good overall and individually for HMDA and CRA loans. HMDA loans were made in all of the tracts in the assessment area, while there was no CRA lending in an upper-income tract in the western portion of the county. The borrower distribution is also good, with HMDA lending being good and CRA lending being adequate. WesBanco originated one qualified community development loan amounting to \$1,152,000 in Jackson County. This loan was to an organization that provides services to low- and moderate-income individuals. Thus, WesBanco's lending performance in this area is consistent with the bank's overall performance.

The one new investment for \$1,738 represents the assessment area's share of a mortgage-backed security. There were also 18 investments made in prior periods that had an outstanding balance of \$481,764. Further, the bank made four donations to various community development organizations for \$6,000. Therefore, WesBanco's investment performance in the area is consistent with the bank's overall performance.

In 2005, a branch in Ripley was closed. The office was in a middle-income tract. The closure left the bank with only one office in the county. This office is also in a middle-income tract. There are only six tracts in this county, with four of them (66.7%) being middle-income. Further, the bank's community development services are considered adequate. Thus, WesBanco's service performance in this assessment area is consistent with the institution's service performance overall.

STATE OF OHIO

CRA RATING FOR: State of Ohio:⁴³ Outstanding

The Lending Test is rated: Outstanding

The Investment Test is rated: Outstanding

The Service Test is rated: Outstanding

Major factors supporting the institution's rating include:

- Lending levels reflect excellent responsiveness to assessment area credit needs;
- The geographic distribution of loans reflects good penetration throughout the assessment areas;
- The distribution of borrowers reflects, given the product lines offered, good penetration among customers of different income levels and businesses of different sizes;
- The bank is a leader in making community development loans;
- The bank has a significant level of qualified community development investments and grants, often in a leadership position;
- Delivery systems are accessible to essentially all portions of the bank's assessment areas.
- The record of opening and closing of branches has not adversely affected the accessibility of its delivery systems, particularly low- and moderate-income geographies and/or low- or moderate-income individuals; and,
- A leader in providing community development services.

SCOPE OF EXAMINATION

The scope of the examination for the State of Ohio is consistent with the scope of the examination of the institution. The Cincinnati-Middletown, Columbus, and Springfield metropolitan statistical areas and the statewide non-metropolitan area received full scope reviews. These assessment areas received greater weight than the Dayton MSA, which had a limited scope.

DESCRIPTION OF INSTITUTION'S OPERATIONS IN THE STATE OF OHIO

The State of Ohio represented 23.0% of deposits and 19.5% of loans. Additionally, 28.2% of the WesBanco's offices are in Ohio.

⁴³ 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.

WesBanco's operations in Ohio are in the southern portion of the state. There are 735 tracts in Ohio, including 89 low-, 188 moderate-, 296 middle- and 160 upper-income tracts. The income is unknown for two of the tracts. There are distressed and underserved middle-income tracts in the nonmetropolitan assessment area. The relatively large number of tracks reflects that two of Ohio's most populous counties, Franklin and Hamilton, are included in the bank's assessment area.

There are 22 offices and 31 ATMs (19 full service and 12 cash-only) in Ohio. Since the previous evaluation there was one closure, one opening, and one relocation in the Columbus MSA.

The Cincinnati MSA is a new assessment area as a result of WesBanco's acquisition of The Winton Savings and Loan Company. For the previous evaluation, the Dayton and Springfield MSAs were combined, since they represented a primary metropolitan statistical area ("PMSA"). The OMB changed definitions of metropolitan statistical areas in 2003. PMSAs no longer exist; rather, metropolitan divisions were created. A metropolitan division must have a core population of 2.5 million. Since the combination of the Dayton and Springfield MSAs does not achieve this population level, the areas were reviewed separately. The Springfield MSA represented a larger percentage of WesBanco's deposits and loans; therefore, this assessment area received a full scope review, while the Dayton MSA was reviewed under the limited scope procedures.

As of June 30, 2006, WesBanco ranked 20th out of 296 institutions in Ohio with 0.5% of deposits.⁴⁴ Financial institutions with the greatest percentage of deposits in Ohio were National City Bank, Fifth Third Bank, and KeyBank, National Association.

Key demographic information for the State of Ohio is on the following page.

⁴⁴ FDIC Summary of Deposits: www.fdic.gov.

Combined Demographics Report

WesBanco Bank

Analysis Year: 2005 & 2006

Assessment Group(s): All OH

Income Categories	Tract Distribution		Families by Tract Income		Families < Poverty Level as % of Families by Tract		Families by Family Income	
	#	%	#	%	#	%	#	%
Low-income	89	12.1	49,991	6.9	17,533	35.1	150,534	20.7
Moderate-income	188	25.6	152,289	21.0	22,291	14.6	132,728	18.3
Middle-income	296	40.3	313,487	43.2	16,569	5.3	161,905	22.3
Upper-income	160	21.8	210,608	29.0	4,150	2.0	281,208	38.7
Unknown-income	2	0.3	0	0.0	0	0.0	0	0.0
Total Assessment Area	735	100.0	726,375	100.0	60,543	8.3	726,375	100.0
	Housing Units by Tract	Housing Types by Tract						
		Owner-Occupied			Rental		Vacant	
		#	%	%	#	%	#	%
Low-income	114,498	25,579	3.6	22.3	70,632	61.7	18,287	16.0
Moderate-income	299,577	126,728	17.9	42.3	143,109	47.8	29,740	9.9
Middle-income	520,983	325,952	46.1	62.6	165,982	31.9	29,049	5.6
Upper-income	312,685	229,016	32.4	73.2	69,689	22.3	13,980	4.5
Unknown-income	0	0	0.0	0.0	0	0.0	0	0.0
Total Assessment Area	1,247,743	707,275	100.0	56.7	449,412	36.0	91,056	7.3
	Total Businesses by Tract	Businesses by Tract & Revenue Size						
		Less Than or = \$1 Million		Over \$1 Million		Revenue Not Reported		
		#	%	#	%	#	%	
Low-income	7,966	8.7	6,466	8.1	1,291	12.2	209	11.9
Moderate-income	17,994	19.6	15,384	19.4	2,261	21.3	349	19.8
Middle-income	37,118	40.4	32,290	40.6	4,089	38.5	739	41.9
Upper-income	28,488	31.0	25,145	31.6	2,881	27.1	462	26.2
Unknown-income	272	0.3	170	0.2	99	0.9	3	0.2
Total Assessment Area	91,838	100.0	79,455	100.0	10,621	100.0	1,762	100.0
Percentage of Total Businesses:			86.5		11.6		1.9	
	Total Farms by Tract	Farms by Tract & Revenue Size						
		Less Than or = \$1 Million		Over \$1 Million		Revenue Not Reported		
		#	%	#	%	#	%	
Low-income	12	0.9	12	0.9	0	0.0	0	0.0
Moderate-income	169	12.8	166	12.9	1	4.3	2	66.7
Middle-income	756	57.4	743	57.6	12	52.2	1	33.3
Upper-income	379	28.8	369	28.6	10	43.5	0	0.0
Unknown-income	0	0.0	0	0.0	0	0.0	0	0.0
Total Assessment Area	1,316	100.0	1,290	100.0	23	100.0	3	100.0
Percentage of Total Farms:			98.0		1.7		0.2	

CONCLUSIONS WITH RESPECT TO PERFORMANCE TESTS IN THE STATE OF OHIO

Lending Test

WesBanco's performance on the lending test is for the State of Ohio is "Outstanding." Lending to tracts of different income categories, especially to low- and moderate-income geographies, is reasonably dispersed. Loans to low- and moderate-income borrowers and small businesses and farms are good. Community development loans have significantly increased since the prior period evaluation and have enhanced the bank's performance.

Lending Activity

Lending levels reflect excellent responsiveness to the State of Ohio's credit needs throughout this assessment area given its size in comparison to WesBanco's overall lending activity.

The bank made \$173.2 million in loans in the State of Ohio in the evaluation period. This represented 19.5% of WesBanco's lending activity. The percentage of loans is less than the both the percentage of offices and percentage of deposits in the state at 28.2% and 23.0%, respectively. WesBanco ranked 68th of 723 HMDA reporters and 25th of 138 CRA reporters.

Geographic Distribution

The geographic distribution of loans is good. There was a significant percentage of tracts in which there was no lending in the Cincinnati, Columbus, and Dayton MSAs; however, mitigating factors exist in each area to account for the low penetration. Specific details are discussed in each of the assessment area sections. Otherwise, lending to different geographies is reasonable.

Borrower Distribution

The borrower distribution of loans is good. Lending is reasonably dispersed to borrowers of different income levels, especially to low- and moderate-individuals, and to small businesses and farms.

Community Development Lending

The bank is a leader in making community development loans in the State of Ohio. WesBanco made eight loans totaling \$3,047,260. The state represented 3.3% of community development loans. Since the prior period evaluation, community development loans increased 43.5% in the State of Ohio.

Investment Test

WesBanco's performance under the investment test is "Outstanding." There were three new mortgage-backed securities targeted to low- and moderate-income borrowers and/or properties in low- and moderate-income tracts which were allocated by deposit share across the five Ohio assessment areas. One of these three securities was allocated to Ohio only, while another was allocated to both Ohio and Pennsylvania and the third was allocated to all three states. Further, there were two equity investments in funds that promote affordable housing. These funds were only allocated to Ohio. In addition, there were two securities, one equity and one mortgage-backed that were made in Hamilton County and one low-income housing tax credit security was made in Franklin County. Current period investments in Ohio totaled \$5,203,184.

There were also 36 investments made in prior periods that had outstanding balances equaling \$3,752,714 as of year-end 2006. Further, the bank made 57 donations to various community development organizations totaling \$106,310.

Service Test

WesBanco's performance under the service test is "Outstanding." Retail delivery systems are accessible to the bank's different geographies and individuals of varying income levels while community development services are excellent.

Retail Services

Retail delivery systems are accessible to the bank's geographies and individuals of different income levels in the State of Ohio. WesBanco's record of opening and closing of branches has not adversely affected the accessibility of its delivery systems, particularly to low- and moderate-income individuals and/or geographies. Services do not vary in a way that inconveniences its assessment area, particularly low- and moderate-income geographies and/or individuals.

All of the branch activity has occurred in the Columbus MSA since the prior evaluation. In August 2005, a branch in an upper-income tract in Columbus was closed, while an office in a middle-income tract in Bexley opened in December 2005. An office in a middle-income tract in Columbus was relocated to an upper-income tract in Columbus in November 2006.

The following table illustrates the distribution of offices and full services ATMs in the State of Ohio compared to the tract distribution and percentage of families.

Tract Category	Tract Distribution (%)	Percentage of Families by Tract	Percentage of Branches	Percentage of Full Service ATMs
Low	12.1	6.9	0.0	0.0
Moderate	25.6	21.0	22.7	21.1
Middle	40.3	43.2	45.5	42.1
Upper	21.8	29.0	31.8	36.8

In Columbus, three offices are near to moderate-income tracts. Further, a majority of the low-income tracts are in the Cincinnati and Columbus MSAs. The bank is new to the Cincinnati market and its offices in Columbus are concentrated on the eastern portion of the county. Thus, retail services are accessible to essentially all areas of the State of Ohio.

Community Development Services

WesBanco is a leader in making community development services in the State of Ohio. In addition to the services discussed in each respective assessment area, financial literacy classes were conducted in four of the five areas in Ohio.

METROPOLITAN AREAS

DESCRIPTION OF INSTITUTION'S OPERATIONS IN THE CINCINNATI- MIDDLETOWN MSA, STATE OF OHIO

The Cincinnati MSA represented 9.8% of the bank's deposits and 6.1% of its loans. There are seven offices and seven full service ATMs in this assessment area.

The assessment area consists only of Hamilton County, which is part of the Cincinnati-Middletown OH-KY-IN MSA. Hamilton County is in the extreme southwestern portion of Ohio. The Cincinnati MSA is a multistate metropolitan area that includes Brown, Butler, Clermont, Hamilton, and Warren Counties in Ohio; Boone, Bracken, Campbell, Gallatin, Grant, Kenton, and Pendleton Counties in Kentucky; and Dearborn, Franklin, and Ohio Counties in Indiana. Since WesBanco has no offices in the Kentucky and Indiana portions of this MSA, this assessment area is included in the State of Ohio rating than having a separate multistate rating.

The assessment area is comprised of 230 tracts. The tract distribution is as follows:

- 40 low-income
- 49 moderate-income
- 92 middle-income
- 47 upper-income
- 2 unknown-income

The low-income tracts are mostly in and around the city of Cincinnati. The moderate-income tracts are dispersed throughout the county; however, a large number of them are also in Cincinnati and its vicinity.

This assessment area was added as a result of WesBanco's acquisition of The Winton Savings and Loan Company on January 3, 2005. Since the merger occurred after the review period for the 2005 evaluation, the Cincinnati-Middletown MSA was not reviewed at that time.

As of June 30, 2006, WesBanco ranked 11th out of 42 institutions in Hamilton County with 1.1% of total deposits.⁴⁵ Fifth Third Bank and U.S. Bank, National Association are the dominant competitors in this county, with a combined deposit share of 65.1%.

A community contact was conducted in connection with this evaluation to a housing agency that serves Hamilton County. The organization's representative indicated that there are many available homes; however, the quality of the housing stock is poor, especially for low- and moderate-income individuals. She stated that financial institutions should make more funds available to landlords to help them repair their properties. She also noted that many of the organization's clients do not trust banks and there are not enough branches in impoverished areas to ease this hesitation

Population Characteristics

⁴⁵ FDIC Summary of Deposits: www.fdic.gov

The population in this assessment area was 845,303 as of the 2000 census. From 1990 to 2000, the population of Hamilton County decreased by 2.4%, while the population fell 2.7% from 2000 to 2006.⁴⁶

The population was primarily White non-Hispanic at 72.4%, while Black non-Hispanics were the largest minority group at 23.7%. Of the total population, 25.8% were age 17 years and younger, 9.6% were age 18 to 24 years, 51.2% were age 25 to 64 years, and 13.5% were age 65 and over.

Income Characteristics

The median family income for Hamilton County was \$53,438, which was higher than the State of Ohio's median family income of \$50,037, but slightly lower than the Cincinnati-Middletown MSA's median family income of \$54,771. Families comprised 61.5% of households. The poverty level in Hamilton County was 8.9%, which was higher than both the State of Ohio's rate of 7.8% and the MSA's rate of 6.9%. Of the families living in the assessment area, 21.8% were low-income families, 17.9% were moderate-income families, 21.5% were middle-income families, and 38.9% were upper-income families.

Housing Characteristics

As of the 2000 census, there were 373,393 housing units in the assessment area. About half (55.6%) of the units were owner-occupied. The percentage of units housing 1-4 families was 74.6% while 24.50% housed five families or more. In the low- and moderate-income tracts, the vacancy rate was 16.1 and 9.6%, respectively, compared to the statewide average of 7.1% while the percentage of rental units in these geographies were 65.6% and 50.9%, compared to the statewide average of 28.71%. The median age of the housing stock was 44 years, which was older than the median age of housing stock for the State of Ohio of 38 years and the MSA's median age of 35 years.

Labor, Employment, and Economic Characteristics

The 2006 annual average unemployment rate for Hamilton County was 5.0%,⁴⁷ which was higher than the nationwide average of 4.6%, but lower than the statewide average of 5.5% and the Cincinnati MSA's average of 5.2%.

⁴⁶ USDA Economic Research: www.ers.usda.gov

⁴⁷ www.bls.gov/lau

Major employers in Hamilton County include several insurance and financial services companies, such as American Financial Group Inc., Fifth Third Bancorp, and US Bancorp. Large manufacturers in the county include Ford Motor Company, General Electric Company, Johnson & Johnson, and Procter & Gamble.⁴⁸

Key demographic information about the assessment area is found on the following page.

⁴⁸ Ohio County Profiles of the Office of Strategic Research, Ohio Department of Development:
<http://www.odod.state.oh.us/research/>

Combined Demographics Report

WesBanco Bank

Analysis Year: 2005 & 2006

Assessment Area(s): Cincinnati-Middletown OH-KY-IN MSA 17140

Income Categories	Tract Distribution		Families by Tract Income		Families < Poverty Level as % of Families by Tract		Families by Family Income	
	#	%	#	%	#	%	#	%
Low-income	40	17.4	21,281	10.0	8,109	38.1	46,499	21.8
Moderate-income	49	21.3	35,311	16.5	4,846	13.7	38,149	17.9
Middle-income	92	40.0	99,792	46.8	4,849	4.9	45,856	21.5
Upper-income	47	20.4	57,064	26.7	1,076	1.9	82,944	38.9
Unknown-income	2	0.9	0	0.0	0	0.0	0	0.0
Total Assessment Area	230	100.0	213,448	100.0	18,880	8.8	213,448	100.0
	Housing Units by Tract	Housing Types by Tract						
		Owner-Occupied			Rental		Vacant	
		#	%	%	#	%	#	%
Low-income	49,693	9,085	4.4	18.3	32,613	65.6	7,995	16.1
Moderate-income	73,987	29,248	14.1	39.5	37,643	50.9	7,096	9.6
Middle-income	165,753	105,553	50.9	63.7	52,036	31.4	8,164	4.9
Upper-income	83,960	63,647	30.7	75.8	16,965	20.2	3,348	4.0
Unknown-income	0	0	0.0	0.0	0	0.0	0	0.0
Total Assessment Area	373,393	207,533	100.0	55.6	139,257	37.3	26,603	7.1
	Total Businesses by Tract		Businesses by Tract & Revenue Size					
			Less Than or = \$1 Million		Over \$1 Million		Revenue Not Reported	
			#	%	#	%	#	%
Low-income	2,678	9.6	2,214	9.3	406	11.2	58	13.3
Moderate-income	4,714	16.9	3,991	16.7	643	17.7	80	18.3
Middle-income	12,585	45.0	10,689	44.7	1,702	46.8	194	44.4
Upper-income	7,714	27.6	6,828	28.6	784	21.6	102	23.3
Unknown-income	272	1.0	170	0.7	99	2.7	3	0.7
Total Assessment Area	27,963	100.0	23,892	100.0	3,634	100.0	437	100.0
Percentage of Total Businesses:			85.4		13.0		1.6	
	Total Farms by Tract		Farms by Tract & Revenue Size					
			Less Than or = \$1 Million		Over \$1 Million		Revenue Not Reported	
			#	%	#	%	#	%
Low-income	5	3.6	5	3.7	0	0.0	0	0.0
Moderate-income	9	6.5	9	6.7	0	0.0	0	0.0
Middle-income	69	49.6	66	48.9	2	66.7	1	100.0
Upper-income	56	40.3	55	40.7	1	33.3	0	0.0
Unknown-income	0	0.0	0	0.0	0	0.0	0	0.0
Total Assessment Area	139	100.0	135	100.0	3	100.0	1	100.0
Percentage of Total Farms:			97.1		2.2		0.7	

**CONCLUSIONS WITH RESPECT TO PERFORMANCE TESTS IN THE CINCINNATI-
MIDDLETOWN, MSA, STATE OF OHIO**

Lending Test

WesBanco's performance under the lending test for this assessment area is excellent. Lending to different tracts is reasonably distributed, especially to low- and moderate-income geographies. Loans to borrowers of different income categories and to small businesses are good. Community development loans have enhanced the bank's lending performance.

Home improvement loans were not reviewed in this assessment area, as there was insufficient volume to perform a meaningful analysis.

Lending Activity

Lending activity reflects an excellent responsiveness to assessment area credit needs given the size of the market and the fact that it is a new area for the bank.

The bank made \$69.7 million in loans in the assessment area in the evaluation period. This represented 6.1% of WesBanco's lending activity. The percentage of loans is less than the both the percentage of offices in Hamilton County at 9.0% and the percentage of deposits at 9.8%. WesBanco ranked 66th of 470 HMDA reporters and 29th of 80 CRA reporters in the assessment area.

Geographic Distribution

The geographic distribution of loans in this assessment area is good overall and good for both HMDA and CRA lending.

The following table indicates the number and percentage of tracts in which there was no lending:

Loan Type	Low-Income Tracts		Moderate-Income Tracts		Middle-Income Tracts		Upper-Income Tracts	
	#	%	#	%	#	%	#	%
HMDA	29	72.5	24	49.0	31	33.7	13	27.7
CRA	36	90.0	31	63.3	69	75.0	37	78.7

There was also no lending in the two tracts in which the tract income was unknown. The various tracts where there was no lending are dispersed throughout the assessment area. This is a new assessment area for the bank. Further, when plotting the loan distribution compared to branch locations, it was noted that loan patterns are more concentrated near the bank's branches and are less concentrated as the distance from the nearest office becomes greater. Although there are a number of tracts without loans, mitigating factors explain the low penetration.

Home Purchase Loans

WesBanco made 1.8% of its home purchase loans in the low-income tracts, which was less than the percentage of owner-occupied units in these tracts at 4.4%. The aggregate of all HMDA lenders made 5.4% of their loans in these geographies, which surpassed the bank's performance. Thus, the geographic distribution of home purchase loans to low-income tracts is poor.

The bank originated 11.6% of its home purchase loans in the moderate-income tracts, which was less than the percentage of owner-occupied units in these tracts at 14.1%. The aggregate of all HMDA lenders who made 16.7% of their loans in these geographies outperformed the bank. Therefore, the geographic distribution of home purchase loans to moderate-income tracts is good.

WesBanco originated 54.7% and 32.0% of its home purchase loans in the middle- and upper-income tracts, respectively, compared to the percentage of owner-occupied units in these tracts at 50.9% and 30.7%. The aggregate of all HMDA lenders made 51.7% and 26.1% of their loans to the middle- and upper-income tracts.

Refinance Loans

The bank made 3.7% of its refinance loans in the low-income tracts, which was less than the percentage of owner-occupied units in these geographies at 4.4%. The aggregate of all HMDA lenders made 5.6% of their loans in these geographies, which surpassed WesBanco's performance. Therefore, the geographic distribution of refinance loans to low-income tracts is good.

WesBanco originated 9.8% of its refinance loans in the moderate-income tracts, which was less than the percentage of owner-occupied units in these tracts at 14.1%. The aggregate of all HMDA lenders made 17.2% of their loans in these geographies, which surpassed the bank's percentage. Thus, the geographic distribution of refinance loans to moderate-income tracts is adequate.

The bank originated 55.2% and 31.3% of its refinance loans in the middle- and upper-income tracts, respectively, compared to the percentage of owner-occupied units in these tracts at 50.9% and 30.7%. The aggregate of all HMDA lenders made 52.0% and 25.2% of their loans to the middle- and upper-income tracts.

Small Business Loans

WesBanco made 5.0% of its small loans to businesses in the low-income tracts, which was less than the percentage of businesses in these geographies at 9.6%. The aggregate of all CRA lenders made 7.1% of their loans in these tracts, which exceeded the bank's percentage. Therefore, the geographic distribution of small loans to businesses to the low-income tracts is adequate.

The bank made 23.3% of its small loans to businesses in the moderate-income tracts, which was greater than the percentage of businesses in these tracts at 16.9%. WesBanco outperformed the aggregate of all CRA lenders, who made 16.0% of their loans in the moderate-income geographies. Thus, the geographic distribution of small loans to businesses to the moderate-income tracts is excellent.

WesBanco originated 54.8% and 31.3% of its small loans to businesses in the middle- and upper-income tracts, respectively, compared to the percentage of businesses in these tracts at 45.0% and 27.6%. The aggregate of all CRA lenders made 42.2% and 33.0% of their loans to the middle- and upper-income tracts.

Distribution by Borrower Income and Revenue Size of the Business

The borrower distribution is good overall and good for both HMDA and CRA lending.

Home Purchase Loans

WesBanco made 12.0% of its home purchase loans to low-income borrowers, which was less than the percentage of low-income families at 21.8%. WesBanco outperformed the aggregate of all HMDA lenders, who made 9.7% of their loans to low-income borrowers. Thus, the borrower distribution of home purchase loans to low-income borrowers is adequate.

The bank originated 23.1% of its home purchase loans to moderate-income borrowers, which exceeded both the percentage of moderate-income families at 17.9% and the percentage of loans made by the aggregate of all HMDA lenders at 22.5%. Therefore, the borrower distribution of home purchase loans to moderate-income borrowers is excellent.

WesBanco made 23.1% and 35.6% of its home purchase loans to middle- and upper-income borrowers, respectively, compared to the percentage of middle- and upper-income families at 21.5% and 38.9%. The aggregate of all HMDA lenders made 20.7% and 28.1% of their loans to middle- and upper-income borrowers. The borrowers' income was not available for 6.2% of the loans originated in this assessment area.

Refinance Loans

The bank made 11.7% of its refinance loans to low-income borrowers, which was less than the percentage of low-income families at 21.8%. WesBanco surpassed the aggregate of all HMDA lenders, who made 8.6% of their loans to low-income borrowers. Therefore, the borrower distribution of home refinance loans to low-income borrowers is adequate.

WesBanco originated 23.3% of its refinance loans to moderate-income borrowers, which surpassed the percentage of moderate-income families at 17.9% and the percentage of loans made by the aggregate of all HMDA lenders at 20.1%. Thus, the borrower distribution of refinance loans to moderate-income borrowers is excellent.

WesBanco made 28.2% and 29.4% of its refinance loans to middle- and upper-income

borrowers, respectively, compared to the percentage of middle- and upper-income families at 21.5% and 38.9%. The aggregate of all HMDA lenders made 22.9% and 29.1% of their loans to middle- and upper-income borrowers. The borrowers' income was not available for 7.4% of the loans originated in this assessment area.

Small Business Loans

WesBanco originated 66.7% of its small business loans to businesses with less than \$1 million in revenue compared to the aggregate of all CRA lenders, who originated 36.4% of their small business loans to these businesses. Business with less than \$1 million in revenue account for 85.4% of all businesses in the assessment area. Therefore, the borrower distribution of loans to small businesses is good.

Community Development Lending

WesBanco has made an excellent level of community development loans in the Cincinnati MSA. The bank made one qualified community development loan totaling \$1,280,000, which was for an organization that provides services to low- and moderate-income individuals. This loan represented 1.4% of the bank's qualified community development loans.

Investment Test

WesBanco has made an excellent level of qualified community development investments and grants. Seven new investments totaling approximately \$2.6 million were made in this assessment area. One equity investment and one mortgage-backed security, both of which promote affordable housing, were made specifically for the assessment area, while the other five investments represent the assessment area's allocations of three mortgage-backed securities and two equity investments that were divided among all the Ohio assessment areas.

There were also seven investments made in prior period that had outstanding balances equaling \$1,259,095 as of year-end 2006. The bank also made 24 donations for \$22,950 to various community organizations.

Service Test

The service test in the Cincinnati MSA is considered good. The branch distribution is reasonable, while the level of community development services is good, especially since the bank is new to the area.

Retail Services

Retail delivery systems are reasonably accessible to the bank’s geographies and individuals of different income levels in its assessment areas. WesBanco’s record of opening and closing of branches has not adversely affected the accessibility of its delivery systems, particularly to low- and moderate-income individuals and/or geographies. Services do not vary in a way that inconveniences its assessment area, particularly low- and moderate-income geographies and/or individuals.

All of the branches except one are located in the city of Cincinnati itself. The other office is in Harrison. There is one office with a full service ATM in a moderate-income tract. The four offices in middle-income tracts all have full service ATMs. The upper-income tract has one branch with a full service ATM, one branch without an ATM, and a full service ATM. One office in a middle-income tract is near to several moderate-income tracts and another office in a middle-income tract is nearby to several low-income tracts. The following table illustrates the distribution of branches and full service ATMs in the Cincinnati-Middletown MSA compared to the tract distribution and percentage of families.

Tract Category	Tract Distribution (%)	Percentage of Families by Tract	Percentage of Branches	Percentage of Full Service ATMs
Low	17.4	10.0	0.0	0.0
Moderate	21.3	16.5	14.3	14.3
Middle	40.0	46.8	57.1	57.1
Upper	20.4	26.7	28.6	28.6

Community Development Services

The bank makes a relatively high level of community development services considering that this is a new assessment area. Examples of qualified community development services in this assessment area include:

- *Cincinnati Development Fund* – This organization promotes affordable housing and community revitalization. An employee is on the loan committee and the board of directors.
- *Cincinnati Works* – An employee taught a monthly class on checking and budgeting to unemployed individuals.
- *The Homeownership Center* – A bank employee presented a homebuyer education class for low- and moderate-income individuals.
- *Living Hope Transitional Homes* – An employee serves as treasurer for this organization, which provides transitional housing for homeless women and children.
- *Project Connect* – An employee provided fundraising assistance and serves on the board of trustees for this organization, which assists homeless families.

- *Walnut Hills Redevelopment Association* – A bank employee spoke to prospective low- and moderate-income borrowers about affordable housing.
- *Working in Neighborhoods* – One employee provided guidance on obtaining financing while another taught an affordable housing seminar to low- and moderate-income individuals who are served by this organization.

DESCRIPTION OF INSTITUTION'S OPERATIONS IN THE COLUMBUS MSA, STATE OF OHIO

The Columbus MSA represented 3.1% of deposits and 2.6% of loans. There are four offices, two full service ATMs, and three cash-only ATMs in this assessment area. Although this assessment area is relatively small in terms of the bank's overall market, a full scope was performed because of branch activity since the previous examination.

The Columbus MSA is located in central Ohio and consists of Delaware, Fairfield, Franklin, Licking, Madison, Morrow, Pickaway, and Union Counties. All of WesBanco's offices are in Franklin County and the bank has elected to include only this county as part of its assessment area. The city of Columbus, which is the capital of Ohio, is in Franklin County.

The assessment area is comprised of 264 tracts. The tract distribution is as follows:

- 34 low-income
- 79 moderate-income
- 89 middle-income
- 62 upper-income

A majority of the low- and moderate-income tracts are in the central part of the county, which corresponds to the location of the city of Columbus itself.

As of June 30, 2006, WesBanco ranked 15th out of 39 institutions in Franklin County with 0.4% of total deposits.⁴⁹ The three major competitors in the market (Huntington National Bank, JPMorgan Chase Bank, National Association, and Fifth Third Bank) constituted 69.9% of the deposits in the county.

One community contact was made to a housing agency that serves Columbus and Franklin County. The organization's representative indicated that economic conditions remain difficult for the individuals it serves, particularly those who do not possess enough education to obtain higher paying jobs and that makes it difficult for these individuals to own homes. He noted that financial institutions could provide more acquisition and development funding, along with offering free financial counseling services.

Population Characteristics

As of the 2000 census, the population in this assessment area was 1,068,978. From 1990 to 2000, the population of Franklin County grew 11.2%, while the growth rate was 2.5% from 2000 to 2006.⁵⁰

The population was mostly White non-Hispanic at 74.4% while the largest minority group was

⁴⁹ FDIC Summary of Deposits: www.fdic.gov

⁵⁰ USDA Economic Research: www.ers.usda.gov

Black non-Hispanic at 18.3%. Asian non-Hispanics were 3.31% of the population. Of the total population, 25.1% were age 17 years and younger, 11.7% were age 18 to 24 years, 53.4% were age 25 to 64 years, and 9.8% were age 65 and over.

Income Characteristics

The median family income for Franklin County was \$53,779, which was higher than the State of Ohio's median family income of \$50,037, but lower than the Columbus MSA's median family income of \$54,708. Families comprised 60.4% of households. The poverty level in the county was 8.2%, which was higher than both the State of Ohio's rate of 7.8% and the MSA's rate of 7.0%. Of the families living in the assessment area, 20.7% were low-income families, 18.1% were moderate-income families, 22.6% were middle-income families, and 38.6% were upper-income families.

Housing Characteristics

There were 471,016 housing units in Franklin County as of the 2000 census. Approximately half (53.0%) of the units were owner-occupied. Units housing 1-4 families were 74.9% of total units and housing for 5 families or more were 24.1% of the housing stock. Mobile homes were 1.1% of units. In the low- and moderate-income tracts, the vacancy rate was 13.9% and 8.5%, respectively, compared to the statewide average of 7.1% while the percentage of rental units in these geographies were 62.2% and 52.7%, compared to the statewide average of 28.7%. The median age of the housing stock was 32 years, which was younger than the median age of housing stock for the State of Ohio of 38 years, but higher than the MSA's median age of 29 years.

Labor, Employment, and Economic Characteristics

The 2006 annual average unemployment rate for Franklin County was 4.7%, which was slightly higher than the nationwide average of 4.6%, but lower than the statewide average of 5.5% and the same as the average for the Columbus MSA.⁵¹

Since Columbus is the state capital a large number of people are employed by the State of Ohio. Columbus is also home to Ohio State University, which is also a large employer. Other employers include Ashland Specialty Chemical Company, Battelle Memorial Institute (a research firm), Grant/Riverside Methodist Hospitals, Limited Brands, and Wendy's International.⁵²

Key demographic information about the assessment area is found on the following page.

⁵¹ www.bls.gov/lau

⁵² Ohio County Profiles of the Office of Strategic Research, Ohio Department of Development: <http://www.odod.state.oh.us/research/>

Combined Demographics Report

WesBanco Bank

Analysis Year: 2005 & 2006

Assessment Area(s): Columbus OH MSA 18140

Income Categories	Tract Distribution		Families by Tract Income		Families < Poverty Level as % of Families by Tract		Families by Family Income	
	#	%	#	%	#	%	#	%
Low-income	34	12.9	20,978	7.9	6,759	32.2	54,956	20.7
Moderate-income	79	29.9	61,867	23.3	8,749	14.1	47,981	18.1
Middle-income	89	33.7	97,807	36.9	4,790	4.9	59,901	22.6
Upper-income	62	23.5	84,577	31.9	1,444	1.7	102,391	38.6
Unknown-income	0	0.0	0	0.0	0	0.0	0	0.0
Total Assessment Area	264	100.0	265,229	100.0	21,742	8.2	265,229	100.0
	Housing Units by Tract	Housing Types by Tract						
		Owner-Occupied			Rental		Vacant	
		#	%	%	#	%	#	%
Low-income	48,032	11,443	4.6	23.8	29,895	62.2	6,694	13.9
Moderate-income	125,337	48,707	19.5	38.9	66,039	52.7	10,591	8.5
Middle-income	166,841	98,385	39.4	59.0	59,794	35.8	8,662	5.2
Upper-income	130,806	91,078	36.5	69.6	33,437	25.6	6,291	4.8
Unknown-income	0	0	0.0	0.0	0	0.0	0	0.0
Total Assessment Area	471,016	249,613	100.0	53.0	189,165	40.2	32,238	6.8
	Total Businesses by Tract		Businesses by Tract & Revenue Size					
			Less Than or = \$1 Million		Over \$1 Million		Revenue Not Reported	
			#	%	#	%	#	%
Low-income	3,413	9.4	2,763	8.9	537	13.0	113	14.4
Moderate-income	7,060	19.5	6,066	19.4	848	20.5	146	18.6
Middle-income	12,867	35.6	11,132	35.7	1,433	34.6	302	38.5
Upper-income	12,800	35.4	11,248	36.0	1,328	32.0	224	28.5
Unknown-income	0	0.0	0	0.0	0	0.0	0	0.0
Total Assessment Area	36,140	100.0	31,209	100.0	4,146	100.0	785	100.0
Percentage of Total Businesses:			86.4		11.5		2.2	
	Total Farms by Tract		Farms by Tract & Revenue Size					
			Less Than or = \$1 Million		Over \$1 Million		Revenue Not Reported	
			#	%	#	%	#	%
Low-income	3	1.3	3	1.4	0	0.0	0	0.0
Moderate-income	28	12.4	28	12.7	0	0.0	0	0.0
Middle-income	94	41.6	90	40.9	4	66.7	0	0.0
Upper-income	101	44.7	99	45.0	2	33.3	0	0.0
Unknown-income	0	0.0	0	0.0	0	0.0	0	0.0
Total Assessment Area	226	100.0	220	100.0	6	100.0	0	0.0
Percentage of Total Farms:			97.3		2.7		0.0	

**CONCLUSIONS WITH RESPECT TO PERFORMANCE TESTS IN THE COLUMBUS
MSA, STATE OF OHIO**

Lending Test

WesBanco's performance under the lending test for this assessment area is excellent. Lending is reasonably distributed to tracts of different income levels and to borrowers of different categories and to small businesses. Community development loans enhance the bank's lending performance.

HMDA loans were combined for this assessment area, as there were insufficient numbers of home purchase, refinance, and home improvement loans to perform a separate analysis on each type.

Lending Activity

Lending activity reflects an excellent responsiveness to assessment area credit needs given the size of this market.

The bank made \$41.5 million in loans in the assessment area in the evaluation period. This represented 2.6% of WesBanco's lending activity. The percentage of loans is less than the both the percentage of offices in Franklin County at 5.1% and the percentage of deposits at 3.1%. WesBanco ranked 125th of 530 HMDA reporters and 26th of 91 CRA reporters in the assessment area.

Geographic Distribution

The geographic distribution of loans in this assessment area is good, which is an improvement from the prior period evaluation when it was adequate. HMDA lending is excellent and CRA lending is good.

The following table indicates the number and percentage of tracts in which there was no lending:

Loan Type	Low-Income Tracts		Moderate-Income Tracts		Middle-Income Tracts		Upper-Income Tracts	
	#	%	#	%	#	%	#	%
HMDA	25	73.5	60	75.9	56	62.9	49	79.0
CRA	30	88.2	66	83.5	71	80.0	36	58.1

The various tracts where there was no lending are dispersed throughout the assessment area. The bank's offices are concentrated in the east central and northeastern part of the county and a loan plotting shows that pockets of lending mostly occur around these offices. When viewing the loan plots, it was noted that there were some pockets of lending in northwestern and west central Franklin County. The former is a concentration of upper-income tracts, while the latter is a concentration of moderate-income tracts. In these areas, the bank has made commercial loans to home improvement companies and these companies have referred their customers to WesBanco for loans. Further, the difference in penetration between the low-, moderate-, middle- and upper-income tracts does not vary greatly, which indicates that the bank is not purposely excluding low- and moderate-income tracts. Therefore, the relatively low penetration is reasonable.

HMDA Loans

The bank made 14.2% of its HMDA loans in the low-income tracts, which was significantly more than the percentage of owner-occupied units in these tracts at 4.6% and the percentage of loans made by the aggregate of all HMDA lenders at 6.5%. Thus, the geographic distribution of HMDA loans to low-income tracts is excellent.

WesBanco made 24.5% of its HMDA loans in the moderate-income tracts, which exceeded the percentage of owner-occupied units in these tracts at 19.5% and the percentage of loans made by the aggregate of all HMDA lenders at 18.4%. Therefore, the geographic distribution of HMDA loans to moderate-income tracts is excellent.

The bank originated 43.4% and 17.9% of its HMDA loans in middle- and upper-income tracts respectively, compared to the percentage of owner-occupied units in these geographies at 39.4% and 36.5%. The aggregate of all HMDA lenders made 40.2% and 34.9% of their loans in the middle- and upper-income tracts.

Small Business Loans

WesBanco made 5.1% of its small loans to businesses in the low-income tracts, which was less than the percentage of businesses in these tracts at 9.4%. The aggregate of all CRA lenders, who made 7.0% of their loans in these geographies, surpassed the bank's performance. Thus, the geographic distribution of small loans to businesses to the low-income tracts is adequate.

The bank originated 25.5% of its small loans to businesses in the moderate-income tracts, which exceeded the percentage of businesses in these tracts at 19.5% and the percentage of loans made by the aggregate of all CRA lenders at 17.1%. Thus, the geographic distribution of small loans to businesses to the moderate-income tracts is excellent.

The bank made 22.4% and 46.9% of its small loans to businesses in middle- and upper-income tracts, respectively, compared to the percentage of businesses in these geographies at 35.6% and 35.4%. The aggregate of all CRA lenders made 34.8% and 40.0% of their loans in the middle- and upper-income tracts.

Distribution by Borrower Income and Revenue Size of the Business

The borrower distribution is good, which is also an improvement from the prior period evaluation when it was adequate. A greater percentage of loans was made to low-income borrowers and to small businesses than in the prior period. HMDA and CRA lending are both good.

HMDA Loans

WesBanco made 14.2% of its HMDA loans to low-income borrowers, which was less than the percentage of low-income families at 20.7%. The bank's performance exceeded the percentage of loans made by the aggregate of all HMDA lenders at 8.9%. Therefore, the borrower distribution of HMDA loans to low-income borrowers is adequate.

The bank originated 33.0% of its HMDA loans to moderate-income borrowers, which surpassed the percentage of moderate-income families at 18.1% and the percentage of loans made by the aggregate of all HMDA lenders at 21.3%. Thus, the borrower distribution of HMDA loans to moderate-income borrowers is excellent.

WesBanco made 12.3% and 17.0% of its HMDA loans to middle- and upper-income borrowers, respectively, compared to the percentage of middle- and upper-income families at 22.6% and 38.6%. The aggregate of all HMDA lenders originated 22.2% and 28.8% of their loans to middle- and upper-income borrowers. The borrowers' income was not available for 23.6% of the loans made in this assessment area.

Small Business Loans

The bank originated 69.4% of its small loans to business to businesses with less than \$1 million in revenue compared to the aggregate of all CRA lenders, who made 33.7% of their loans to these businesses. Businesses with less than \$1 million in revenue constitute 86.4% of all businesses in Franklin County. Thus, the borrower distribution of loans to small businesses is good.

Community Development Lending

WesBanco has made an excellent level of community development loans in the Columbus MSA. The bank originated three qualified community development loans totaling \$1,125,000. One of the loans was for an organization that provides services to low- and moderate-income individuals, while two were for economic development. These loans represented 1.2% of the bank's total community development loans. No qualified community development loans were made in this assessment area during the prior period evaluation.

Investment Test

WesBanco has made an excellent level of qualified community development investments and grants, often in a leadership position. Six new investments totaling \$1,325,806 were made in the Columbus MSA. One mortgage-backed security was made specifically for this assessment area, while the other five represented the assessment area's allocation of three mortgage-backed securities and two equity investments that were divided among the Ohio assessment areas by deposit share.

There were also 14 investments made in prior periods that had unamortized balances equaling \$2,305,232. WesBanco also made 17 donations equaling \$41,500 to various community development organizations.

Service Test

The service test in the Columbus MSA is considered excellent. Retail services are good, while community development services are excellent.

Retail Services

Retail delivery systems are reasonably accessible to the bank's geographies and individuals of different income levels in its assessment areas. WesBanco's record of opening and closing of branches has not adversely affected the accessibility of its delivery systems, particularly to low- and moderate-income individuals and/or geographies. Services do not vary in a way that inconveniences its assessment area, particularly low- and moderate-income geographies and/or individuals.

A closure, opening, and relocation have occurred in the Columbus MSA since the prior evaluation. In August 2005, the Stoneridge Plaza office in Columbus was closed. This branch was located in an upper-income tract. Banking services were not adversely affected, as a new office is within 1.5 of the closed facility and another branch is approximately 2 miles away. A new office was opened in middle-income tract in Bexley in December 2005. In November 2006, the Reynoldsburg office was relocated from a middle-income tract in Columbus to a upper-income tract in the same city. The relocation was effectuated to upgrade banking facilities in the same general area. The two facilities are approximately two miles from each other.

There are two offices with cash-only ATMs and one cash-only ATM in the middle-income tracts. Two offices with full service ATMs are in upper-income tracts. The following table illustrates the distribution of offices and full service ATMs in the Columbus MSA compared to the tract distribution and percentage of families.

Tract Category	Tract Distribution (%)	Percentage of Families by Tract	Percentage of Branches	Percentage of Full Service ATMs
Low	12.9	7.9	0.0	0.0
Moderate	29.9	23.3	0.0	0.0
Middle	33.7	36.9	50.0	0.0
Upper	23.5	31.9	50.0	100.0

Community Development Services

WesBanco is a leader in making community development services. Examples of services include:

- *Columbus Saves* – An employee serves on the board of directors for this organization, which provides affordable housing to low- and moderate-income households.
- *Franklinton Development Association* – This organization promotes affordable housing for low- and moderate-income individuals. One employee serves on the board of directors while another counseled potential first-time home buyers.
- *Habitat for Humanity* – An employee is on the member of the family selection committee and on the board of directors for the local chapter of this organization.
- *INCREASE Community Development Corporation* – This organization promotes entrepreneurship and economic development. An employee has conducted training for new small business owners and helped to arrange financing to small business owners.
- *Northside Community Development Corporation* – This organization promotes affordable housing for low- and moderate-income individuals. A bank employee serves on the board of directors.

DESCRIPTION OF INSTITUTION'S OPERATIONS IN THE SPRINGFIELD MSA, STATE OF OHIO

The Springfield MSA represented 6.8% of WesBanco's deposits of 4.2% of its loans. There are four offices, five full service ATMs, and six cash-only ATMs in this assessment area.

Clark County is the only county in the Springfield MSA. The entire county, which is in central Ohio, is included in the assessment area. Previously, Clark County was part of the Dayton-Springfield MSA. The Springfield MSA was created in 2003. The combined population of the Dayton and Springfield MSA is less than \$2.5 million; therefore, the two MSAs must be separated. There are 43 census tracts in the Springfield MSA: 2 low-, 9 moderate-, 22 middle-, and 10 upper-income tracts.

As of June 30, 2006, WesBanco ranked fourth out of 9 institutions in the Springfield MSA with 13.6% of total deposits.⁵³ Major competitors in this area included The Security National Bank and Trust Co., which is headquartered in Springfield, National City Bank, Huntington National Bank, and KeyBank National Association.

One community contact was performed for this evaluation to an agency that provides daycare assistance and other community services in Springfield. The organization operates in an area with high crime, teenage pregnancy, unemployment, and drug abuse rates. The assistant director noted that local banks have been willing to provide funds on a short-term basis to cover operating expenses. WesBanco was able to provide the organization with construction funds needed to renovate its current building.

Population Characteristics

The population in the assessment area as of the 2000 census was 144,742. From 1990 to 2000, the population in Clark County decreased by 1.9% and fell 2.0% from 2000 to 2006.⁵⁴

The population was mostly White non-Hispanic at 87.6%, with Black non-Hispanic the largest minority group at 9.4%. Of the total population, 25.1% were age 17 years and younger, 9.1% were age 18 to 24 years, 51.1% were age 25 to 64 years, and 14.7% were age 65 and over.

Income Characteristics

The median family income the Springfield MSA was \$48,067, which was lower than the State of Ohio's median family income of \$50,037. Families comprised 69.8% of households. The poverty level for the MSA was 7.9%, which is about the same as Ohio's rate of 7.8%. Of the families living in the assessment area, 18.6% were low-income families, 18.5% were moderate-income families, 24.2% were middle-income families, and 38.7% were upper-income families.

Housing Characteristics

⁵³ FDIC Summary of Deposits: www.fdic.gov

⁵⁴ USDA Economic Research: www.ers.usda.gov

As of the 2000 census, Clark County had 61,056 housing units, of which 66.3% were owner-occupied. One-to-four family units were 86.2% of the housing stock while multifamily housing represented 8.8% of units. Mobile homes were 5.0% of housing units. The vacancy rate in low- and moderate-income tracts was 21.5% and 13.0%, which was much higher than the statewide average of 7.1%. The percentage of rental units in these tracts was 49.3% and 47.0%, which also surpassed the statewide rate of 28.8%. The median age of the housing stock was 42 years, which was older than the median age for the State of Ohio of 38 years.

Labor, Employment, and Economic Characteristics

The 2006 annual average unemployment rate for the Springfield MSA was 5.6%, which was higher than the nationwide average of 4.6% and slightly higher than the statewide average of 5.5%. Springfield's unemployment rate was 294th of 369 metropolitan statistical areas in the country.⁵⁵

Major employers in the Springfield MSA include Dole Fresh Vegetables, Fortis/Assurant Group (an insurance company), and International Truck and Engine Corp. Other large employers are Mercy Medical Center, Springfield City Board of Education, and Wittenburg University.⁵⁶

Key demographic information about the assessment area is found on the following page.

⁵⁵ www.bls.gov/lau

⁵⁶ Ohio County Profiles of the Office of Strategic Research, Ohio Department of Development:
<http://www.odod.state.oh.us/research/>

Combined Demographics Report

WesBanco Bank

Analysis Year: 2005 & 2006

Assessment Area(s): Springfield OH MSA 44220

Income Categories	Tract Distribution		Families by Tract Income		Families < Poverty Level as % of Families by Tract		Families by Family Income	
	#	%	#	%	#	%	#	%
Low-income	2	4.7	1,091	2.8	388	35.6	7,375	18.6
Moderate-income	9	20.9	5,471	13.8	1,106	20.2	7,302	18.5
Middle-income	22	51.2	22,290	56.3	1,320	5.9	9,572	24.2
Upper-income	10	23.3	10,717	27.1	309	2.9	15,320	38.7
Unknown-income	0	0.0	0	0.0	0	0.0	0	0.0
Total Assessment Area	43	100.0	39,569	100.0	3,123	7.9	39,569	100.0
	Housing Units by Tract	Housing Types by Tract						
		Owner-Occupied			Rental		Vacant	
		#	%	%	#	%	#	%
Low-income	2,396	701	1.7	29.3	1,181	49.3	514	21.5
Moderate-income	9,837	3,934	9.7	40.0	4,621	47.0	1,282	13.0
Middle-income	34,935	24,018	59.3	68.8	8,888	25.4	2,029	5.8
Upper-income	13,888	11,837	29.2	85.2	1,468	10.6	583	4.2
Unknown-income	0	0	0.0	0.0	0	0.0	0	0.0
Total Assessment Area	61,056	40,490	100.0	66.3	16,158	26.5	4,408	7.2
	Total Businesses by Tract		Businesses by Tract & Revenue Size					
			Less Than or = \$1 Million		Over \$1 Million		Revenue Not Reported	
			#	%	#	%	#	%
Low-income	121	3.2	106	3.2	13	3.9	2	3.2
Moderate-income	694	18.5	610	18.2	73	21.7	11	17.7
Middle-income	1,981	52.7	1,780	53.0	169	50.1	32	51.6
Upper-income	963	25.6	864	25.7	82	24.3	17	27.4
Unknown-income	0	0.0	0	0.0	0	0.0	0	0.0
Total Assessment Area	3,759	100.0	3,360	100.0	337	100.0	62	100.0
Percentage of Total Businesses:			89.4		9.0		1.6	
	Total Farms by Tract		Farms by Tract & Revenue Size					
			Less Than or = \$1 Million		Over \$1 Million		Revenue Not Reported	
			#	%	#	%	#	%
Low-income	0	0.0	0	0.0	0	0.0	0	0.0
Moderate-income	4	1.8	4	1.9	0	0.0	0	0.0
Middle-income	93	42.9	91	43.3	2	28.6	0	0.0
Upper-income	120	55.3	115	54.8	5	71.4	0	0.0
Unknown-income	0	0.0	0	0.0	0	0.0	0	0.0
Total Assessment Area	217	100.0	210	100.0	7	100.0	0	0.0
Percentage of Total Farms:			96.8		3.2		0.0	

CONCLUSIONS WITH RESPECT TO PERFORMANCE TESTS IN THE SPRINGFIELD MSA, STATE OF OHIO

Lending Test

WesBanco's performance under the lending test for this assessment area is excellent. Loans to tracts of different income levels are reasonably distributed, especially to low- and moderate-income tracts. Lending to low- and moderate-income borrowers and small businesses is excellent. Borrower distribution is weighed more heavily in this assessment area as 37.1% of the families are either low- or moderate-income while only 25.6% of the tracts are low- or moderate. Community development loans are adequate.

Lending Activity

Lending activity reflects a good responsiveness to assessment area credit needs given the size of this market.

The bank made \$32.7 million in loans in the assessment area in the evaluation period. This represented 4.2% of WesBanco's lending activity. The percentage of loans is less than the both the percentage of offices in Clark County at 5.1% and the percentage of deposits at 6.8%. WesBanco ranked 11th of 260 HMDA reporters and 15th of 42 CRA reporters in the assessment area.

Geographic Distribution

The geographic distribution of loans in this assessment area is good. The level of HMDA lending is good, while CRA lending is adequate.

No CRA loans were made in 1 of the 2 low-income tracts, 5 of the 9 moderate-income tracts (55.6%), 11 of the 22 middle income tracts, and 2 of the 10 upper-income tracts. No HMDA loans were made in 1 of the 9 moderate-income tracts (11.1%). Lending opportunities in this tract are limited as the owner-occupancy rate is only 16.0%. There were also no HMDA loans in 1 of the 22 middle-income tracts (4.5%).

Home Purchase Loans

WesBanco made 4.5% of its home purchase loans in low-income tracts, which surpassed the percentage of owner-occupied units in these tracts at 1.7% and the percentage of loans made by the aggregate of all HMDA lenders at 1.6%. Thus, the geographic distribution of home purchase loans to low-income tracts is excellent.

The bank originated 13.5% of its home purchase loans in moderate-income tracts, which exceeded the percentage of owner-occupied units in these tracts at 9.7%. The bank surpassed the performance of the aggregate of all HMDA lenders, who made 9.9% of their loans in these geographies. Therefore, the geographic distribution of home purchase loans to moderate-income tracts is excellent.

The bank made 53.9% and 28.1% of its home purchase loans in the middle- and upper-income

tracts compared to the percentage of owner-occupied units in these tracts at 59.3% and 29.2%. The aggregate of all HMDA lenders made 64.1% and 24.4% of their loans to the middle- and upper-income tracts.

Refinance Loans

WesBanco originated 1.0% of its refinance loans in the low-income tracts, which was less than the percentage of owner-occupied units in these tracts at 1.7%. The aggregate of all HMDA lenders, who made 2.2% of their loans in these geographies, exceeded the bank's performance. Thus, the geographic distribution of refinance loans to low-income tracts is adequate.

The bank made 7.7% of its refinance loans in the moderate-income tracts, which was less than the percentage of owner-occupied units in these tracts at 9.7%. The aggregate of all HMDA lenders, who made 11.7% of their loans in these tracts, outperformed the bank. Therefore, the geographic distribution of refinance loans to the moderate-income tracts is good.

WesBanco made 51.9% and 39.4% of its refinance loans in the middle- and upper-income tracts compared to the percentage of owner-occupied units in these tracts at 59.3% and 29.2%. The aggregate of all HMDA lenders made 56.6% and 29.6% of their loans to the middle- and upper-income tracts.

Home Improvement Loans

WesBanco originated 3.0% of its home improvement loans in the low-income tracts, which surpassed the percentage of owner-occupied units in these tracts at 1.7% and the percentage of loans made by the aggregate of all HMDA lenders at 1.9%. Therefore, the geographic distribution of home improvement loans to the low-income tracts is excellent.

The bank made 13.6% of its home improvement loans in the moderate-income tracts, which exceeded the percentage of owner-occupied units in these tracts at 9.7% and the percentage of loans made by the aggregate of all HMDA lenders at 10.2%. Thus, the geographic distribution of home improvement loans to the moderate-income tracts is excellent.

WesBanco originated 62.1% and 21.2% of its refinance loans in the middle- and upper-income tracts compared to the percentage of owner-occupied units in these tracts at 59.3% and 29.2%. The aggregate of all HMDA lenders made 57.2% and 30.7% of their loans to the middle- and upper-income tracts.

Small Business Loans

The bank originated 1.5% of its small loans to businesses in the low-income tracts, which was less than the percentage of businesses in these tracts at 3.2%. The aggregate CRA lenders made a larger percentage of loans in these tracts at 2.6%. Therefore, the geographic distribution of small loans to businesses to the low-income tracts is poor.

WesBanco made 10.8% of its small loans to businesses in the moderate-income tracts, which was less than the percentage of businesses in these tracts at 18.5% and the percentage of loans by

the aggregate of all CRA lenders at 14.4%. Thus, the geographic distribution of small loans to businesses to the moderate-income tracts is adequate.

WesBanco originated 47.7% and 40.0% of its small loans to businesses in the middle- and upper-income tracts compared to the percentage of businesses in these tracts at 52.7% and 25.6%. The aggregate of all CRA lenders made 52.4% and 28.9% of their loans to the middle- and upper-income tracts.

Distribution by Borrower Income and Revenue Size of the Business

The borrower distribution is excellent. HMDA lending is excellent, while CRA lending is adequate. HMDA loans are weighted more heavily than CRA loans.

Home Purchase Loans

WesBanco made 21.3% of its home purchase loans to low-income borrowers, which surpassed the percentage of low-income families at 18.6% and the percentage of loans made by the aggregate of all HMDA lenders at 10.3%. Therefore, the borrower distribution of home purchase loans to low-income borrowers is excellent.

The bank originated 29.2% of its home purchase loans to moderate-income borrowers, which exceeded the percentage of moderate-income families at 18.5% and the percentage of loans made by the aggregate of all HMDA lenders at 24.6%. Thus, the borrower distribution of home purchase loans to moderate-income borrowers is excellent.

The bank made 22.5% and 23.6% of its home purchase loans to middle- and upper-income borrowers compared to the percentage of middle- and upper-income families at 24.2% and 38.7%. The aggregate of all HMDA lenders made 23.0% and 26.3% of their loans to middle- and upper-income borrowers. The borrowers' income was not available for 3.3% of the loans made in the assessment area.

Refinance Loans

WesBanco made 10.6% of its refinance loans to low-income borrowers, which was less than the percentage of low-income families at 18.6%. The bank outperformed the aggregate of all HMDA lenders, who made 9.6% of their loans to low-income borrowers. Thus, the borrower distribution of refinance loans to low-income borrowers is adequate.

The bank originated 35.6% of its refinance loans to moderate-income borrowers, which exceeded the percentage of moderate-income families at 18.5% and the percentage of loans made by the aggregate of all HMDA lenders at 18.4%. Therefore, the borrower distribution of refinance loans to moderate-income borrowers is excellent.

The bank made 16.3% and 35.6% of its refinance loans to middle- and upper-income borrowers compared to the percentage of middle- and upper-income families at 24.2% and 38.7%. The aggregate of all HMDA lenders made 25.2% and 27.4% of their loans to middle- and upper-

income borrowers. The borrowers' income was not available for 1.9% of the loans made in the assessment area.

Home Improvement Loans

WesBanco made 22.7% of its home improvement loans to low-income borrowers, which exceeded the percentage of low-income families at 18.6% and the percentage of loans made by the aggregate of all HMDA lenders at 13.6%. Therefore, the borrower distribution of home improvement loans to low-income borrowers is excellent.

The bank originated 51.5% of its home improvement loans to moderate-income borrowers, which surpassed the percentage of moderate-income families at 18.5% and the percentage of loans made by the aggregate of all HMDA lenders at 24.6%. Thus, the borrower distribution of home improvement loans to moderate-income borrowers is excellent.

The bank made 7.6% and 15.2% of its home improvement loans to middle- and upper-income borrowers compared to the percentage of middle- and upper-income families at 24.2% and 38.7%. The aggregate of all HMDA lenders made 24.8% and 35.5% of their loans to middle- and upper-income borrowers. The borrowers' income was not available for 1.5% of the loans made in the assessment area.

Small Business Loans

The bank originated 50.0% of its small loans to business to businesses with less than \$1 million in revenue compared to the aggregate of all CRA lenders, who made 44.1% of their loans to these businesses. Businesses with less than \$1 million in revenue constitute 89.4% of all businesses in Clark County. Thus, the borrower distribution of loans to small businesses is adequate.

Community Development Lending

WesBanco has made an adequate level of community development loans in the Springfield MSA. WesBanco originated one qualified community development loan totaling \$40,000 to an organization that provides services to low- and moderate-income individuals. The loan represented less than 1.0% of the bank's overall community development loans. The amount of loans was 92.5% lower than the prior period evaluation.

Investment Test

WesBanco has made an excellent level of qualified community development investments and grants, often in a leadership position. The five new investments totaling \$630,898 represent the assessment area's share of three mortgage-backed securities and two equity investments allocated among the Ohio assessment areas. There were seven investments made in prior periods with unamortized balances equaling \$724,131 as of year-end 2006. The bank also made nine donations for \$36,750.

Service Test

The service test in the Springfield MSA is considered excellent.

Retail Services

Retail delivery systems are readily accessible to the bank's geographies and individuals of different income levels in its assessment areas. WesBanco's record of opening and closing of branches has not adversely affected the accessibility of its delivery systems, particularly to low- and moderate-income individuals and/or geographies. Services do not vary in a way that inconveniences its assessment area, particularly low- and moderate-income geographies and/or individuals.

One branch with a full service ATM and four cash-only ATMs are in moderate-income tracts, all of which are in Springfield. There are two branches with full service ATMs, one cash-only ATM, and a full service ATM in middle-income geographies. An office with a full service ATM and a cash-only ATM are in upper-income tracts. The following table illustrates the percentage of branches and full service ATMs in the Springfield MSA compared to the tract distribution and percentage of families.

Tract Category	Tract Distribution (%)	Percentage of Families by Tract	Percentage of Branches	Percentage of Full Service ATMs
Low	4.7	2.8	0.0	0.0
Moderate	20.9	13.8	25.0	20.0
Middle	51.2	56.3	50.0	60.0
Upper	23.3	27.1	25.0	20.0

Community Development Services

The bank is a leader in making community development services. Examples of qualified community development services include:

- *American Cancer Society* – The organization provides free or reduced cancer services for those who cannot otherwise afford it. An employee serves on the board of directors.
- *Bridges Out of Poverty* – A bank employee participated in a simulation that helps people understand the realities of poverty.
- *Habitat for Humanity* – One employee serves on advisory board, one is a member of the

family selection committee, and one helps to obtain funding for the organization's local chapter.

- *Neighborhood Housing Partnership* – One employee is a member of the loan review committee, while another participated in the organization's lending partner program. This agency's primary purpose is to create and preserve affordable housing.
- *Rocking Horse Center* – This organization provides medical services to those who cannot afford it. An employee served on the finance committee.

METROPOLITAN AREA
(limited scope review)

DESCRIPTION OF INSTITUTION'S OPERATIONS IN DAYTON MSA, STATE OF OHIO

The Dayton MSA represented 0.7% of the bank's deposits and 1.1% of its loans. There are three branches, three full service ATMs, and two cash-only ATMs in this assessment area.

The Dayton MSA is in west central Ohio and consists of Greene, Miami, Montgomery, and Preble Counties; however, only Greene and Montgomery Counties are included in the bank's assessment area. There are 178 census tracts in Greene and Montgomery Counties. The tract distribution is as follows:

- 13 low-income
- 42 moderate-income
- 82 middle-income
- 41 upper-income

All of the low-income tracts are in Montgomery County, in or nearby the city of Dayton. The moderate-income tracts in Montgomery County are in the outlying areas of Dayton, while the moderate-income geographies in Greene County are in Xenia and Fairborn. A branch with an ATM and two cash-only ATMs are in middle-income tracts. Two branches with full service ATMs are in upper-income geographies.

As of June 30, 2006, WesBanco ranked 18th out of 24 institutions in Greene and Montgomery Counties with 0.2% of total deposits.⁵⁷ Major competitors in the county included Fifth Third Bank, National City Bank, JPMorgan Chase Bank, National Association, and KeyBank National Association.

Key demographic information about the assessment area is on the following page.

⁵⁷ FDIC Summary of Deposits: www.fdic.gov

Combined Demographics Report

WesBanco Bank

Analysis Year: 2005 & 2006

Assessment Area(s): Dayton OH MSA 19380

Income Categories	Tract Distribution		Families by Tract Income		Families < Poverty Level as % of Families by Tract		Families by Family Income	
	#	%	#	%	#	%	#	%
Low-income	13	7.3	6,641	3.6	2,277	34.3	36,317	19.4
Moderate-income	42	23.6	40,165	21.5	6,328	15.8	34,364	18.4
Middle-income	82	46.1	81,689	43.7	4,322	5.3	41,525	22.2
Upper-income	41	23.0	58,250	31.2	1,321	2.3	74,539	39.9
Unknown-income	0	0.0	0	0.0	0	0.0	0	0.0
Total Assessment Area	178	100.0	186,745	100.0	14,248	7.6	186,745	100.0
	Housing Units by Tract	Housing Types by Tract						
		Owner-Occupied			Rental		Vacant	
		#	%	%	#	%	#	%
Low-income	14,377	4,350	2.3	30.3	6,943	48.3	3,084	21.5
Moderate-income	73,532	34,941	18.7	47.5	31,044	42.2	7,547	10.3
Middle-income	134,727	85,032	45.5	63.1	41,958	31.1	7,737	5.7
Upper-income	84,031	62,454	33.4	74.3	17,819	21.2	3,758	4.5
Unknown-income	0	0	0.0	0.0	0	0.0	0	0.0
Total Assessment Area	306,667	186,777	100.0	60.9	97,764	31.9	22,126	7.2
	Total Businesses by Tract	Businesses by Tract & Revenue Size						
		Less Than or = \$1 Million		Over \$1 Million		Revenue Not Reported		
		#	%	#	%	#	%	
Low-income	1,754	8.1	1,383	7.4	335	14.2	36	9.7
Moderate-income	4,281	19.9	3,594	19.1	626	26.5	61	16.4
Middle-income	8,478	39.4	7,608	40.5	714	30.2	156	41.9
Upper-income	7,011	32.6	6,205	33.0	687	29.1	119	32.0
Unknown-income	0	0.0	0	0.0	0	0.0	0	0.0
Total Assessment Area	21,524	100.0	18,790	100.0	2,362	100.0	372	100.0
Percentage of Total Businesses:			87.3		11.0		1.7	
	Total Farms by Tract	Farms by Tract & Revenue Size						
		Less Than or = \$1 Million		Over \$1 Million		Revenue Not Reported		
		#	%	#	%	#	%	
Low-income	4	0.8	4	0.9	0	0.0	0	0.0
Moderate-income	32	6.7	31	6.6	1	14.3	0	0.0
Middle-income	337	70.9	333	71.2	4	57.1	0	0.0
Upper-income	102	21.5	100	21.4	2	28.6	0	0.0
Unknown-income	0	0.0	0	0.0	0	0.0	0	0.0
Total Assessment Area	475	100.0	468	100.0	7	100.0	0	0.0
Percentage of Total Farms:			98.5		1.5		0.0	

CONCLUSIONS WITH RESPECT TO PERFORMANCE TESTS IN THE DAYTON, OHIO MSA

Small business loans were not evaluated because there was insufficient volume to perform a meaningful analysis and all HMDA loans were combined as there was not enough of each category to analyze them separately

The following table indicates the number and percentage of tracts in which there was no lending:

Loan Type	Low-Income Tracts		Moderate-Income Tracts		Middle-Income Tracts		Upper-Income Tracts	
	#	%	#	%	#	%	#	%
HMDA	13	100.0	34	81.0	67	81.7	30	73.2

The bank's offices are located in the extreme southeastern portion in Montgomery County and the eastern and northern part of Greene County. All of the low-income and a number of moderate-income tracts are in Dayton, which is a considerable distance from the bank's offices. Thus, the relatively low lending penetration is reasonable. The geographic distribution is good, as lending to the moderate-income tracts is similar to the percentage of owner-occupied units in these tracts. The borrower distribution is excellent, as lending to low- and moderate-income borrowers exceeded both the percentage of these families in the assessment area and the percentage of loans the aggregate of all HMDA lenders made to low- and moderate-income borrowers. The bank made one qualified community development loan totaling \$80,000 to promote affordable housing for low- and moderate-income individuals. This represented a decrease of 95.0% since the prior period evaluation. Thus, WesBanco's lending performance in the area is consistent with the institution's overall performance.

Five new investments were made in the assessment area totaling \$221,375, representing the areas allotment of new mortgage-backed security and equity investments. There were seven investments made in prior periods with outstanding balances as of year-end 2006 without outstanding balances of \$254,107. Four donations equaling \$1,985 were made to various community development organizations. Therefore, WesBanco's investment performance in the area is consistent with the institution's overall performance.

All of the bank's offices, full service ATMs, and cash-only ATMs are in middle- and upper-income tracts. This is reasonable given that there are only three offices in this assessment area. Community development services are good. Thus, WesBanco's service performance is consistent with the institution's overall performance.

NONMETROPOLITAN STATEWIDE AREA⁵⁸

DESCRIPTION OF INSTITUTION'S OPERATIONS IN THE NONMETROPOLITAN AREA, STATE OF OHIO

The Ohio non-metropolitan area represented 2.7% of the bank's deposits and 5.4% of its loans. There are four offices, two full service ATMs, and one cash-only ATM in this assessment area.

The assessment area consists of the southeastern Ohio counties of Guernsey, Harrison, Monroe and Noble. The largest cities in this area are Cambridge in Guernsey County, Cadiz in Harrison County, Woodsfield in Monroe County, and Caldwell in Noble County. There are 9 moderate-income and 11 middle-income tracts in this assessment area. Five middle-income tracts in Guernsey County, two in Monroe County, and three in Noble County were considered distressed in 2005, while only the tracts in Monroe and Noble County were classified as such in 2006. The tracts were distressed because of unemployment. The same three middle-income tracts in Noble County was also classified as underserved in 2005 and 2006.

WesBanco ranked fourth of 11 institutions for total deposits in the four counties in this assessment area with 8.9% of total deposits.⁵⁹ Major competitors in this area included Advantage Bank, which is headquartered in Cambridge, National City Bank, Peoples Bank, National Association, and U.S. Bank, National Association.

A contact was made to an organization that serves young people in Guernsey County. The director indicated that median family income for the county is among the lowest in Ohio, while the unemployment rate hovers around 7% and the poverty rate around 16%. He noted that local financial institutions have provided funds to the agency when needed and have helped to sponsor local events that the agency sponsors.

⁵⁸ The discussion of an institution's CRA performance within a nonmetropolitan statewide area is only required for institutions with branches in two or more states. A separate discussion of CRA performance within a nonmetropolitan statewide area for intrastate banks that have branches in metropolitan and nonmetropolitan areas is optional because the performance in the nonmetropolitan areas have been reviewed and discussed in the overall evaluation of the institution. Examiners may wish to discuss in greater detail, however, the assessment areas within nonmetropolitan areas that were reviewed using a full-scope review for intrastate banks with branches in metropolitan and nonmetropolitan areas or for intrastate banks with branches only in nonmetropolitan areas.

⁵⁹ FDIC Summary of Deposits: www.fdic.gov

Population Characteristics

The population within this assessment area was 75,848 as of the 2000 census. The following table illustrates population growth in the assessment area from 1990 to 2000 and 2000 to 2006⁶⁰:

County Name	Population Change 1990 to 2000 (%)	Population Change 2000 to 2006 (%)
Guernsey County	4.5	0.2
Harrison County	-1.4	-0.4
Monroe County	-2.0	-3.8
Noble County	24.0	0.8

The population was primarily White non-Hispanic at 96.6%, with black non-Hispanics the largest minority group at 1.7%. Of the total population, 25.2% were age 17 years and younger, 7.5% were age 18 to 24 years, 51.9% were age 25 to 64 years, and 15.4% were age 65 and over.

Income Characteristics

The median family income for this assessment area was \$36,012, which was significantly lower than the State of Ohio's median family income of \$50,037. Families comprised 71.4% of households. The poverty level was 11.9%, which was a great deal higher than the State of Ohio's rate of 7.8%. Of the families living in the assessment area, 25.2% were low-income families, 23.1% were moderate-income families, 23.6% were middle-income families, and 28.1% were upper-income families.

Housing Characteristics

As of the 2000 census, there were 35,611 housing units in the assessment area, of which 64.2% were owner-occupied. The majority (77.7%) housed 1-4 families while 4.1% housed 5 families or more and 17.3% were mobile homes. The median age of the housing stock was 37 years, which was about the same as the State of Ohio's median age of 38 years.

⁶⁰ USDA Economic Research: www.ers.usda.gov

Labor, Employment, and Economic Characteristics

The 2006 average unemployment rate for the four counties in this assessment area was as follows:⁶¹

Guernsey County	6.5%
Harrison County	6.0%
Monroe County	11.3%
Noble County	7.2%

The average unemployment rate for the four counties combined was 7.2%. The unemployment rates for all four of the counties exceeded the State of Ohio's average rate of 5.5%. In fact, the unemployment rate for Monroe County was the highest in the state and was among the top 5% of the 3,211 counties nationwide (including Puerto Rico).

Major employers in Guernsey County include Cambridge City Board of Education, Colgate-Palmolive Company, Plastech Engineered Products, and Southeastern Ohio Regional Medical Center. Large employers in Harrison County are CamOhio LLC (a coal company), Freeport Press Inc., Harrison County Hospital, and Saint-Gobain/Bayform, which manufactures window screens. Major employers in Monroe County include Woodsfield Nursing Center, Industrial Paint & Strip Inc., Slay Transportation Co. Inc., and Switzerland of Ohio Local Board of Education. Large employers in Noble County are Glacier Vandervell (a manufacturer of engine bearings), Magnum Magnetics Corp, and Noble Correctional Institute.⁶²

Key demographic information about the assessment area is found on the following page.

⁶¹ www.bls.gov/lau

⁶² Ohio County Profiles of the Office of Strategic Research, Ohio Department of Development:
<http://www.odod.state.oh.us/research/>

Combined Demographics Report

WesBanco Bank

Analysis Year: 2005 & 2006

Assessment Area(s): OH Non-MSA

Income Categories	Tract Distribution		Families by Tract Income		Families < Poverty Level as % of Families by Tract		Families by Family Income	
	#	%	#	%	#	%	#	%
Low-income	0	0.0	0	0.0	0	0.0	5,387	25.2
Moderate-income	9	45.0	9,475	44.3	1,262	13.3	4,932	23.1
Middle-income	11	55.0	11,909	55.7	1,288	10.8	5,051	23.6
Upper-income	0	0.0	0	0.0	0	0.0	6,014	28.1
Unknown-income	0	0.0	0	0.0	0	0.0	0	0.0
Total Assessment Area	20	100.0	21,384	100.0	2,550	11.9	21,384	100.0
	Housing Units by Tract	Housing Types by Tract						
		Owner-Occupied			Rental		Vacant	
		#	%	%	#	%	#	%
Low-income	0	0	0.0	0.0	0	0.0	0	0.0
Moderate-income	16,884	9,898	43.3	58.6	3,762	22.3	3,224	19.1
Middle-income	18,727	12,964	56.7	69.2	3,306	17.7	2,457	13.1
Upper-income	0	0	0.0	0.0	0	0.0	0	0.0
Unknown-income	0	0	0.0	0.0	0	0.0	0	0.0
Total Assessment Area	35,611	22,862	100.0	64.2	7,068	19.8	5,681	16.0
	Total Businesses by Tract		Businesses by Tract & Revenue Size					
			Less Than or = \$1 Million		Over \$1 Million		Revenue Not Reported	
			#	%	#	%	#	%
Low-income	0	0.0	0	0.0	0	0.0	0	0.0
Moderate-income	1,245	50.8	1,123	51.0	71	50.0	51	48.1
Middle-income	1,207	49.2	1,081	49.0	71	50.0	55	51.9
Upper-income	0	0.0	0	0.0	0	0.0	0	0.0
Unknown-income	0	0.0	0	0.0	0	0.0	0	0.0
Total Assessment Area	2,452	100.0	2,204	100.0	142	100.0	106	100.0
Percentage of Total Businesses:			89.9		5.8		4.3	
	Total Farms by Tract		Farms by Tract & Revenue Size					
			Less Than or = \$1 Million		Over \$1 Million		Revenue Not Reported	
			#	%	#	%	#	%
Low-income	0	0.0	0	0.0	0	0.0	0	0.0
Moderate-income	96	37.1	94	36.6	0	0.0	2	100.0
Middle-income	163	62.9	163	63.4	0	0.0	0	0.0
Upper-income	0	0.0	0	0.0	0	0.0	0	0.0
Unknown-income	0	0.0	0	0.0	0	0.0	0	0.0
Total Assessment Area	259	100.0	257	100.0	0	0.0	2	100.0
Percentage of Total Farms:			99.2		0.0		0.8	

CONCLUSIONS WITH RESPECT TO PERFORMANCE TESTS IN THE NONMETROPOLITAN AREA, STATE OF OHIO

Lending Test

WesBanco's performance under the lending test for this assessment area is excellent. Lending to tracts of different-income categories is evenly distributed, especially to the moderate-income geographies. Lending to low- and moderate-income borrowers and to small businesses and small farms is good. Community development loans enhanced the bank's performance.

Lending Activity

Lending activity reflects an excellent responsiveness to assessment area credit needs given the assessment area's size relative to its entire market.

The bank made \$18.9 million in loans in the assessment area in the evaluation period. This represented 5.4% of WesBanco's lending activity. The percentage of loans is more than the percentage of offices in the assessment area and the percentage of deposits in the nonmetropolitan area at 5.1% and 2.7%, respectively. WesBanco ranked fifth of 193 HMDA reporters and seventh of 32 CRA reporters in the Ohio nonmetropolitan area.

Geographic Distribution

The geographic distribution of loans in this assessment area is excellent as compared to the prior period evaluation when it was good. A higher percentage of HMDA loans was made to moderate-income tracts. Small business loans remained excellent and small farm loans were also excellent.

There were no significant lending gaps in this assessment area. No HMDA lending occurred in 1 of the 9 moderate-income tracts (11.1%), while there were no CRA loans in 2 of 11 middle-income tracts (18.2%).

Home Purchase Loans

WesBanco made 46.9% of its home purchase loans in the moderate-income tracts, which surpassed the percentage of owner-occupied units in the tracts at 43.3% and the percentage of loans made by the aggregate of all HMDA lenders at 44.1%. Thus, the geographic distribution of home purchase to moderate-income tracts is excellent.

The bank originated 53.1% of its home purchase loans in the middle-income tracts compared to the percentage of owner-occupied units in these tracts at 56.7%. The aggregate of all HMDA lenders made 55.9% of their loans to the middle-income tracts.

Refinance Loans

WesBanco originated 51.1% of its refinance loans in the moderate-income tracts, which exceeded the percentage of owner-occupied units in these tracts at 43.3% and the percentage of loans made by the aggregate of all HMDA lenders at 39.9%. Therefore, the geographic distribution of refinance loans to the moderate-income tracts is excellent.

The bank made 48.9% of its refinance loans in the middle-income tracts compared to the percentage of owner-occupied units in these tracts at 56.7%. The aggregate of all HMDA lenders made 60.1% of their loans to the middle-income tracts.

Home Improvement Loans

The bank originated 50.5% of its home improvement loans in the moderate-income tracts, which surpassed the percentage of owner-occupied units in these tracts at 43.3% and the percentage of loans made by the aggregate of all HMDA lenders at 37.2%. Thus, the geographic distribution of home improvement loans to the moderate-income tracts is excellent.

The bank made 49.5% of its home improvement loans in the middle-income tracts compared to the percentage of owner-occupied units in these tracts at 56.7%. The aggregate of all HMDA lenders made 62.8% of their loans to the middle-income tracts.

Small Business Loans

WesBanco originated 68.7% of its small loans to businesses in the moderate-income tracts, which was greater than the percentage of businesses in these tracts at 50.8% and the percentage of loans made by the aggregate of all CRA lenders at 46.4%. Thus, the geographic distribution of small loans to businesses to the moderate-income tracts is excellent.

The bank made 31.3% of its small loans to businesses in the middle-income tracts compared to the percentage of businesses in these tracts at 49.2%. The aggregate of all CRA lenders made 50.5% of their loans to the middle-income tracts.

Small Farm Loans

WesBanco made 40.4% of its small loans to farms in the moderate-income tracts, which exceeded the percentage of farms in these tracts at 37.1%. The aggregate of all CRA lenders surpassed, who made 48.8% of their loans in these geographies, the bank's performance. Therefore, the geographic distribution of small loans to farms to the moderate-income tracts is excellent.

WesBanco originated 59.6% of its small loans to farms in the middle-income tracts compared to the percentage of farms in these tracts at 62.9%. The aggregate of all CRA lenders made 51.2% of their loans to the middle-income tracts.

Distribution by Borrower Income and Revenue Size of the Business and Farm

The borrower distribution is good as compared to excellent at the prior period evaluation. A smaller percentage of loans was made to low-income borrowers. HMDA loans are good, while CRA loans are excellent.

Home Purchase Loans

WesBanco made 14.8% of its home purchase loans to low-income borrowers, which was less than the percentage of low-income families at 25.2%. The bank outperformed the aggregate of all HMDA lenders, who made 10.8% of their loans to low-income borrowers. Thus, the borrower distribution of home purchase loans to low-income borrowers is adequate.

The bank originated 35.8% of its home purchase loans to moderate-income borrowers which surpassed the percentage of moderate-income families at 23.1% and the percentage of loans made by the aggregate all HMDA lenders at 22.6%. Therefore, the borrower distribution of home purchase loans to moderate-income borrowers is excellent.

WesBanco made 24.7% and 22.2% of its home purchase loans to middle- and upper-income borrowers, respectively, compared to the percentage of middle- and upper-income families at 23.6% and 28.1%. The aggregate of all HMDA lenders made 23.2% and 24.3% of their loans to middle- and upper-income borrowers. The borrowers' income was unavailable for 2.5% of the loans made in this assessment area.

Refinance Loans

The bank originated 8.5% of its refinance loans to low-income borrowers, which was less than the percentage of low-income families at 25.2% and the percentage of loans made by the aggregate of all HMDA lenders at 10.6%. Thus, the borrower distribution of refinance loans to low-income borrowers is poor.

WesBanco made 36.2% of its refinance loans to moderate-income borrowers, which surpassed the percentage of moderate-income families at 23.1% and the percentage of loans made by the aggregate of all HMDA lenders at 20.7%. Therefore, the borrower distribution of refinance loans to moderate-income borrowers is excellent.

WesBanco originated 25.5% and 23.4% of its home purchase loans to middle- and upper-income borrowers, respectively, compared to the percentage of middle- and upper-income families at 23.6% and 28.1%. The aggregate of all HMDA lenders made 23.9% and 29.5% of their loans to middle- and upper-income borrowers. The borrowers' income was unavailable for 6.4% of the loans made in this assessment area.

Home Improvement Loans

The bank made 36.8% of its home improvement loans to low-income borrowers, which was greater than the percentage of low-income families at 25.2% and the percentage of loans made by the aggregate of all HMDA lenders at 14.3%. Therefore, the borrower distribution of home improvement loans to low-income borrowers is excellent.

The bank originated 46.3% of its loans to moderate-income borrowers, which exceeded the percentage of moderate-income families at 23.1% and the percentage of loans made the aggregate of all HMDA lenders at 31.4%. Thus, the borrower distribution of home improvement loans to moderate-income borrowers is excellent.

WesBanco made 12.6% and 1.1% of its home improvement loans to middle- and upper-income borrowers, respectively, compared to the percentage of middle- and upper-income families at 23.6% and 28.1%. The aggregate of all HMDA lenders made 22.4% and 28.7% of their loans to middle- and upper-income borrowers. The borrowers' income was unavailable for 3.1% of the loans made in this assessment area.

Small Business Loans

The bank made 94.0% of its small business loans to businesses with less than \$1 million in revenue compared to the aggregate of all CRA lenders who originated 41.7% of their loans to these businesses. Businesses with less than \$1 million in revenue comprise 89.9% of all businesses in the assessment area. Therefore, the borrower distribution of small business loans is excellent.

Small Farm Loans

WesBanco originated 100% of its small farm loans to farms with less than \$500,000 in revenue compared to the aggregate of all CRA lenders who made 90.2% of their loans to these farms. Farms with less than \$500,000 in revenue comprise 99.2% of all the farms in the assessment area. Thus, the borrower distribution of small farm loans is excellent.

Community Development Lending

WesBanco has made an excellent level of community development loans in the Ohio non-metropolitan area. The bank originated three qualified loans totaling \$522,260, of which one was for economic development and two were to revitalize or stabilize low-, moderate-, or distressed middle-income tracts. Although these loans represented less than 1% of qualified community development loans, there were no loans made in this assessment area during the prior evaluation period.

Investment Test

WesBanco has made an excellent level of qualified community development investments and grants, often in a leadership position. Five new investments totaling \$466,917 represent the assessment area's allocation of three mortgage-backed securities and two equity investments.

There were also seven investments made in prior period that had outstanding balances equaling \$535,954 as of year-end 2006. The bank also made three donations of \$3,125 to community development organizations.

Service Test

The service test in the assessment area is considered excellent.

Retail Services

Retail delivery systems are readily accessible to the bank's geographies and individuals of different income levels in its assessment areas. WesBanco's record of opening and closing of branches has not adversely affected the accessibility of its delivery systems, particularly to low- and moderate-income individuals and/or geographies. Services do not vary in a way that inconveniences its assessment area, particularly low- and moderate-income geographies and/or individuals.

Two offices with full service ATMs and one branch without an ATM are in moderate-income tracts. There is a branch without an ATM and a cash-only ATM is in Beallsville, which is in a distressed middle-income tract. The following table illustrates the distribution of WesBanco's branches and full service ATMs in this assessment area compared to the tract distribution and percentage of families in each tract.

Tract Category	Tract Distribution (%)	Percentage of Families by Tract	Percentage of Branches	Percentage of Full Service ATMs
Low	0.0	0.0	0.0	0.0
Moderate	45.0	44.3	75.0	100.0
Middle	55.0	55.7	25.0	0.0
Upper	0.0	0.0	0.0	0.0

Community Development Services

The bank is a leader in making community development services. Examples of community development services include:

- *CHIP* – An employee presented information to first-time home buyers.
- *Guernsey County SMARTT Program* – This agency provides services to youths, most of which are low- or moderate-income. An employee serves on the board and provided training on credit.
- *Guernsey County Youth Commission*- An employee serves on the board of directors for this organization, which provides services to low- and moderate-income young people.
- *Ohio Department of Job and Family Services* – An employee provided training on checking and budgeting to unemployed persons.

COMMONWEALTH OF PENNSYLVANIA

CRA RATING FOR: Commonwealth of Pennsylvania:⁶³ Outstanding

The Lending Test is rated: High Satisfactory

The Investment Test is rated: Outstanding

The Service Test is rated: Outstanding

Major factors supporting the institution's rating include:

- Lending levels reflect good responsiveness to assessment area credit needs;
- The geographic distribution of loans reflects excellent penetration throughout the assessment areas;
- The distribution of borrowers reflects, given the product lines offered, good penetration among customers of different income levels and businesses of different sizes;
- The bank makes a relatively high level of community development loans;
- The bank has an excellent level of qualified community development investments and grants, often in a leadership position;
- Delivery systems are readily accessible to all portions of the bank's assessment areas.
- The record of opening and closing of branches has not adversely affected the accessibility of its delivery systems, particularly low- and moderate-income geographies and/or low- or moderate-income individuals; and,
- The bank provides a relatively high level of community development services.

SCOPE OF EXAMINATION

All HMDA loans were combined, as there was insufficient volume to perform a separate analysis on the three different categories of loans; otherwise, the scope of the examination for the Commonwealth of Pennsylvania is consistent with the scope of the examination for the institution. Since WesBanco's assessment area is limited to a portion of the Pittsburgh MSA, the overall state rating only reflects the performance in this area.

DESCRIPTION OF INSTITUTION'S OPERATIONS IN THE COMMONWEALTH OF PENNSYLVANIA

WesBanco's operations in the Commonwealth of Pennsylvania represented 1.7% of the bank's deposits and 1.9% of its loans. There are two offices, two full service ATMs, and one cash-only ATM in Pennsylvania.

⁶³ 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.

WesBanco's assessment area in Pennsylvania consists of parts of Washington County, which is a portion of the Pittsburgh MSA. Other counties in the Pittsburgh MSA are Allegheny, Armstrong, Beaver, Butler, Fayette, and Westmoreland Counties. Washington County is in the southwestern portion of the commonwealth and borders Hancock, Brooke, and Ohio Counties in West Virginia.

There are 36 tracts in the Pennsylvania portion of the assessment area, including 1 low-, 5 moderate-, 20 middle-, and 10 upper-income tracts.

As of June 30, 2006, WesBanco ranked 13th out of 17 institutions in Washington County, with 1.5% of deposits.⁶⁴ Major competitors in this area are National City Bank of Pennsylvania, PNC Bank N.A., Citizens Bank of Pennsylvania, and Washington Federal Savings Bank, which is headquartered in Washington.

A contact was made to a minority business association headquartered in Pittsburgh that serves the surrounding area, including Washington County. The president indicated that the biggest need for minority owned businesses is capital. She indicated that financial institutions could better inform small business owners if potential problems with their credit are noticed so the small business owners can act faster to remedy the situation. She also noted that lenders could be more innovative in granting loans for small businesses.

Population Characteristics

The population within this assessment area was 134,054 as of the 2000 census. The population of Washington County fell 0.8% from 1990 to 2000, but increased 1.7% from 2000 to 2006.

The population was primarily White non-Hispanic at 94.6%, with Black non-Hispanics the largest minority group at 3.8%. Of the total population, 23.3% were age 17 years and younger, 6.8% were age 18 to 24 years, 53.2% were age 25 to 64 years, and 16.7% were age 65 and over.

Income Characteristics

The median family income for the assessment area was \$50,548, which was higher than the commonwealth's median of \$49,184 and the Pittsburgh MSA's median of \$47,195. Families comprised 71.1% of households. The poverty level for the assessment area was 6.1%, which was lower than Pennsylvania's rate of 7.8% and the Pittsburgh MSA's rate of 7.8%.

⁶⁴ FDIC Summary of Deposits: www.fdic.gov.

Housing Characteristics

As of the 2000 census, there were 55,983 housing units in the assessment area, of which 72.6% were owner-occupied. The majority (85.7%) housed 1-4 families, while 7.2% housed 5 families or more and 7.0% were mobile homes. Only 2.1% of the units in the low-income tracts were owner-occupied. The percentage of rentals in moderate-income tracts also exceeded that statewide percentage of 26.1%. Vacancy rates in the low- and moderate-income tracts of 19.5% and 10.3% were more than the statewide vacancy rate of 9.0%. The median age of the housing stock was 42 years, which was about the same as the commonwealth's median age of 43 years and younger than the Pittsburgh MSA's median age of 46 years.

Labor, Employment, and Economic Characteristics

The 2006 average unemployment rate for Washington County was 5.0%, which was higher than the Commonwealth of Pennsylvania's rate of 4.7% and slightly higher than the Pittsburgh MSA's average rate of 4.9%.⁶⁵

Washington County is Pennsylvania's top coal producer and the coal industry employs approximately 2,000 people. Allegheny Ludlum and Washington Steel, both steel producers, are major employers. 84 Lumber Company is also headquartered in this county.⁶⁶

Key demographic information about the Commonwealth of Pennsylvania is on the following page.

⁶⁵ www.bls.gov/lau

⁶⁶ Village Profile-Washington County: www.villageprofile.com

Combined Demographics Report

WesBanco Bank

Analysis Year: 2005 & 2006

Assessment Area(s): Pittsburgh PA MSA 38300

Income Categories	Tract Distribution		Families by Tract Income		Families < Poverty Level as % of Families by Tract		Families by Family Income	
	#	%	#	%	#	%	#	%
Low-income	1	2.8	206	0.6	72	35.0	6,269	16.8
Moderate-income	5	13.9	3,713	9.9	622	16.8	6,730	18.0
Middle-income	20	55.6	21,924	58.6	1,302	5.9	8,333	22.3
Upper-income	10	27.8	11,544	30.9	298	2.6	16,055	42.9
Unknown-income	0	0.0	0	0.0	0	0.0	0	0.0
Total Assessment Area	36	100.0	37,387	100.0	2,294	6.1	37,387	100.0
	Housing Units by Tract	Housing Types by Tract						
		Owner-Occupied			Rental		Vacant	
		#	%	%	#	%	#	%
Low-income	795	17	0.0	2.1	623	78.4	155	19.5
Moderate-income	6,613	3,329	8.2	50.3	2,600	39.3	684	10.3
Middle-income	32,938	24,077	59.2	73.1	6,938	21.1	1,923	5.8
Upper-income	15,637	13,219	32.5	84.5	1,761	11.3	657	4.2
Unknown-income	0	0	0.0	0.0	0	0.0	0	0.0
Total Assessment Area	55,983	40,642	100.0	72.6	11,922	21.3	3,419	6.1
	Total Businesses by Tract		Businesses by Tract & Revenue Size					
			Less Than or = \$1 Million		Over \$1 Million		Revenue Not Reported	
			#	%	#	%	#	%
Low-income	347	6.9	306	7.1	28	4.9	13	9.6
Moderate-income	442	8.8	385	9.0	49	8.6	8	5.9
Middle-income	2,274	45.5	1,990	46.3	211	37.1	73	53.7
Upper-income	1,937	38.7	1,614	37.6	281	49.4	42	30.9
Unknown-income	0	0.0	0	0.0	0	0.0	0	0.0
Total Assessment Area	5,000	100.0	4,295	100.0	569	100.0	136	100.0
Percentage of Total Businesses:			85.9		11.4		2.7	
	Total Farms by Tract		Farms by Tract & Revenue Size					
			Less Than or = \$1 Million		Over \$1 Million		Revenue Not Reported	
			#	%	#	%	#	%
Low-income	0	0.0	0	0.0	0	0.0	0	0.0
Moderate-income	5	3.8	5	3.8	0	0.0	0	0.0
Middle-income	108	81.8	108	83.1	0	0.0	0	0.0
Upper-income	19	14.4	17	13.1	1	100.0	1	100.0
Unknown-income	0	0.0	0	0.0	0	0.0	0	0.0
Total Assessment Area	132	100.0	130	100.0	1	100.0	1	100.0
Percentage of Total Farms:			98.5		0.8		0.8	

CONCLUSIONS WITH RESPECT TO PERFORMANCE TESTS IN THE COMMONWEALTH OF PENNSYLVANIA

Lending Test

WesBanco's performance on the lending test is for the Commonwealth of Pennsylvania is "High Satisfactory." Loans to tracts of different income levels are evenly distributed, especially to low- and moderate-income geographies. Lending to low- and moderate-income borrowers and small businesses is good. Community development loans are adequate.

Lending Activity

Lending levels reflect good responsiveness to the Commonwealth of Pennsylvania's credit needs throughout this assessment area given its relatively small size to the bank's overall market.

The bank originated \$16.4 million in loans in the Pittsburgh MSA during the evaluation period. This represented 1.9% of total loans, which was larger than the percentage of deposits at 1.7% but smaller than the percentage of offices in this assessment area at 2.6%. WesBanco ranked 49th of 287 institutions for HMDA lending and 12th of 45 banks for CRA loans in the assessment area,

Geographic Distribution

The geographic distribution of loans is excellent. HMDA and CRA lending are both excellent.

There were no significant lending gaps in the assessment area. No HMDA loans were made in one of the five moderate income tracts. There were no also HMDA loans in 5 of the 20 middle-income (25.0%) and 3 of the 10 upper-income tracts. No CRA loans were made in 2 of the 5 moderate-income tracts, 5 of the 20 middle-income tracts, and 2 of the 10 upper-income tracts. The bank's offices are concentrated near the low- and moderate-income tracts and some of the upper- and middle-income tracts are a considerable distance from WesBanco's branches.

HMDA Loans

The bank made 3.1% of its HMDA loans in the low-income tract. Less than 0.1% of the owner-occupied units are in this geography and the aggregate of all HMDA lenders made less than 0.1% of their loans in this tract. Thus, the geographic distribution of HMDA loans to the low-income tract is excellent.

WesBanco originated 20.0% of its HMDA loans in the moderate-income tracts, which exceeded the percentage of owner-occupied units in these tracts at 8.2% and the percentage of loans made by the aggregate of all HMDA lenders at 7.7%. Thus, geographic distribution of HMDA loans to the moderate-income tracts is excellent.

The bank originated 55.4% and 21.5% of its HMDA loans in the middle- and upper-income tracts, respectively, compared to the percentage of owner-occupied units in the middle- and upper-income tracts at 59.2% and 32.5%. The aggregate of all HMDA lenders made 49.6% and 42.7% of their loans to middle- and upper-income tracts.

Small Business Loans

WesBanco made 6.1% of its small loans to businesses in the low-income tract, which was less than the percentage of businesses in this tract at 6.9%. The bank outperformed the aggregate of all CRA lenders, who made 3.0% of their loans in the low-income geography. Thus, the geographic distribution of small loans to businesses to the low-income tract is good.

The bank originated 11.0% of its small loans to businesses in the moderate-income tracts, which surpassed the percentage of loans in these tracts at 8.8% and the percentage of loans made by the aggregate of all CRA lenders at 7.7%. Thus, the geographic distribution of small loans to businesses to the moderate-income tract is excellent.

WesBanco originated 64.6% and 18.3% of its small loans to businesses in the middle- and upper-income tracts, respectively, compared to the percentage of businesses in the middle- and upper-income tracts at 45.5% and 38.7%. The aggregate of all CRA lenders made 43.7% and 45.6% of their loans to middle- and upper-income tracts.

Distribution by Borrower Income and Revenue Size of the Business

The borrower distribution of loans is good, which is the same as it was at the prior evaluation. Both HMDA and CRA lending are good.

HMDA Loans

WesBanco made 10.8% of its HMDA loans to low-income borrowers, which was less than the percentage of low-income families at 16.8%. The bank outperformed the aggregate of all HMDA borrowers, who made 5.9% of their loans to low-income borrowers. Therefore, the borrower distribution of HMDA loans to low-income borrowers is adequate.

The bank originated 33.8% of its HMDA loans to moderate-income borrowers, which exceeded the percentage of moderate-income families at 18.0% and the percentage of loans made by the aggregate of all HMDA borrowers at 15.8%. Thus, the borrower distribution of HMDA loans to moderate-income borrowers is excellent.

WesBanco made 12.3% and 38.5% of its HMDA loans to middle- and upper-income borrowers compared to the percentage of middle- and upper-income families at 22.3% and 42.9%. The aggregate of all HMDA lenders made 23.2% and 44.3% of their loans to middle- and upper-income borrowers. The borrower's income was not available for 4.6% of the loans made in the assessment area.

Small Business Loans

The bank originated 68.3% of its small business loans to businesses with less than \$1 million in revenue compared to the aggregate all of CRA lenders who made 39.0% of their loans to these businesses. Businesses with less than \$1 million in revenue comprise 85.9% of businesses in the assessment area. Thus, the borrower distribution of small business loans is good.

Community Development Lending

The bank makes an adequate level of community development loans in the Commonwealth of Pennsylvania. Four loans were made totaling \$5,798,000, of which one was to an organization that provides services to low- and moderate-income individuals and three were for economic development. The four loans represented 5.6% of the bank's overall community development loans. Since the prior period evaluation, community development loans decreased 39.9%.

Investment Test

WesBanco's performance under the investment test is "Outstanding." Three new investments totaling \$1,090,848 were made in this assessment area. One was a bond that promotes affordable housing made specifically for this area and two were mortgage-backed securities that were also allocated to other portions of the overall assessment area.

Further, there were two investments made in prior periods that had outstanding balances totaling \$1,139,450 as of year-end 2006. The bank also made three donations totaling \$2,000.

Service Test

WesBanco's performance under the service test is "Outstanding."

Retail Services

Retail delivery systems are readily accessible to the bank's geographies and individuals of different income levels in the Commonwealth of Pennsylvania. WesBanco's record of opening and closing of branches has not adversely affected the accessibility of its delivery systems, particularly to low- and moderate-income individuals and/or geographies. Services do not vary in a way that inconveniences its assessment area, particularly low- and moderate-income geographies and/or individuals.

All of the bank's offices in this county are in the city of Washington itself, including one branch without an ATM in a low-income tract and one branch with a cash-only ATM and one cash-only ATM in middle-income tracts. The following table illustrates the percentage of branches and full service ATMs in the assessment area compared to the tract distribution and the percentage of families in each tract.

Tract Category	Tract	Percentage of	Percentage of	Percentage of
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	Distribution (%)	Families by Tract	Branches	Full Service ATMs
Low	2.8	0.6	50.0	0.0
Moderate	13.9	9.9	0.0	0.0
Middle	55.6	58.6	50.0	0.0
Upper	27.8	30.9	0.0	0.0

Community Development Services

The bank makes a relatively high level of community development services in the Commonwealth of Pennsylvania. Examples of qualified community development services include:

- *Caring Network* – This organization provides discount and/or free medication to uninsured individuals. An employee serves on the board of directors.
- *Community Action Southwest* – An employee serves of several committees, including the family self-sufficiency committee. This organization provides services to low- and moderate-income individuals and she also gave a presentation on home buying.
- *Financial Education Consortium* – This organization promotes financial literacy to low- and moderate-income individuals. An employee serves on the advisory committee to provide financial expertise.
- *Main Street Washington* – An employee makes decisions on disbursement of local money for the revitalization of buildings and to support small businesses.
- *Washington County Community Foundation* – An employee serves on the board of directors for this organization, which provides services to low- and moderate-income individuals.

APPENDIX A

SCOPE OF EXAMINATION TABLE

SCOPE OF EXAMINATION		
TIME PERIOD REVIEWED	January 1, 2005 through December 31, 2006	
FINANCIAL INSTITUTION		PRODUCTS REVIEWED
WesBanco Bank, Inc. Wheeling, West Virginia		Loans reported under HMDA and CRA
AFFILIATE(S)	AFFILIATE RELATIONSHIP	PRODUCTS REVIEWED
None	None	None

LIST OF ASSESSMENT AREAS AND TYPE OF EXAMINATION

ASSESSMENT AREA	TYPE OF EXAMINATION	BRANCHES VISITED⁶⁷	OTHER INFORMATION
Wheeling WV-OH MSA 48540	Full scope	None	
Parkersburg-Marietta WV-OH MSA 37620	Full scope	None	
Weirton-Steubenville WV-OH MSA 48260	Full scope	None	
WEST VIRGINIA: Charleston MSA 16620 Morgantown MSA 34060 Statewide Nonmetropolitan Jackson County	Full scope Full scope Full scope Limited scope	None	
OHIO: Cincinnati-Middletown MSA 17140 Columbus MSA 18140 Springfield MSA 44220 Dayton MSA 19380 Statewide Nonmetropolitan	Full scope Full scope Full scope Limited scope Full scope	None	
PENNSYLVANIA: Pittsburgh MSA 38300; Washington County	Full scope	None	

⁶⁷ There is a statutory requirement that the written evaluation of a multistate institution's performance must list the individual branches examined in each state. Given WesBanco's size, the institution is supervised under the Federal Reserve's continuous supervision process. Branches and/or the institution's processes for monitoring branch performance are periodically evaluated under this continuous supervision process so no additional review of branches was necessary as part of this CRA performance evaluation.

APPENDIX B

SUMMARY OF STATE AND MULTISTATE METROPOLITAN AREA RATINGS

State or Multistate Metropolitan Area Name	Lending Test Rating	Investment Test Rating	Service Test Rating	Overall State Rating
Wheeling Multistate	Outstanding	Outstanding	Outstanding	Outstanding
Parkersburg-Marietta Multistate	Outstanding	Outstanding	Outstanding	Outstanding
Weirton-Steubenville Multistate	High Satisfactory	Outstanding	Outstanding	Outstanding
State of West Virginia	Outstanding	Outstanding	Outstanding	Outstanding
State of Ohio	Outstanding	Outstanding	Outstanding	Outstanding
Commonwealth of Pennsylvania	High Satisfactory	Outstanding	Outstanding	Outstanding

APPENDIX C

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.

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.

APPENDIX D
CRA CORE TABLES

Bank and Peer Comparison Table Report

Assessment Area/Group: Overall

Income Categories	HMDA									
	By Tract Income					By Borrower Income				
	Bank (2005 & 2006)		Peer (2006)			Bank (2005 & 2006)		Peer (2006)		
	#	%	% \$(000s)	%	% \$(000s)	#	%	% \$(000s)	%	% \$(000s)
	Home Purchase									
Low	19	0.8%	0.6%	3.8%	3.0%	291	12.8%	6.4%	8.9%	5.2%
Moderate	223	9.8%	7.6%	15.3%	10.5%	497	21.9%	15.4%	21.5%	16.0%
Middle	1,276	56.2%	48.4%	47.8%	42.1%	475	20.9%	17.4%	22.1%	19.7%
Upper	751	33.1%	43.5%	33.1%	44.4%	843	37.2%	52.4%	30.4%	43.0%
Unknown	0	0.0%	0.0%	0.0%	0.0%	163	7.2%	8.4%	17.0%	16.1%
Total	2,269	100.0%	100.0%	100.0%	100.0%	2,269	100.0%	100.0%	100.0%	100.0%
	Refinance									
Low	19	1.7%	3.5%	4.1%	3.2%	103	9.2%	4.5%	8.3%	5.0%
Moderate	125	11.1%	9.5%	16.9%	12.4%	228	20.3%	13.1%	18.9%	14.4%
Middle	645	57.4%	48.3%	50.3%	44.0%	254	22.6%	17.8%	23.0%	20.3%
Upper	335	29.8%	38.8%	28.7%	40.4%	450	40.0%	50.7%	32.0%	42.2%
Unknown	0	0.0%	0.0%	0.0%	0.0%	89	7.9%	13.9%	17.8%	18.0%
Total	1,124	100.0%	100.0%	100.0%	100.0%	1,124	100.0%	100.0%	100.0%	100.0%
	Home Improvement									
Low	16	1.1%	2.6%	2.9%	2.6%	431	30.9%	10.2%	11.6%	7.4%
Moderate	197	14.1%	10.9%	15.0%	12.7%	614	44.1%	17.8%	23.0%	17.9%
Middle	956	68.6%	52.8%	54.6%	47.2%	121	8.7%	18.5%	25.6%	21.2%
Upper	224	16.1%	33.7%	27.4%	37.3%	168	12.1%	39.9%	37.0%	49.1%
Unknown	0	0.0%	0.0%	0.0%	0.1%	59	4.2%	13.5%	2.7%	4.5%
Total	1,393	100.0%	100.0%	100.0%	100.0%	1,393	100.0%	100.0%	100.0%	100.0%
	HMDA Totals									
Low	54	1.1%	1.7%	3.9%	3.9%	825	17.2%	6.0%	8.8%	5.1%
Moderate	545	11.4%	8.4%	16.0%	11.5%	1,339	28.0%	14.8%	20.5%	15.0%
Middle	2,877	60.1%	48.7%	49.2%	42.8%	850	17.8%	17.6%	22.7%	19.4%
Upper	1,310	27.4%	41.2%	30.9%	41.8%	1,461	30.5%	50.9%	31.4%	41.6%
Unknown	0	0.0%	0.0%	0.0%	0.0%	311	6.5%	10.6%	16.7%	19.0%
Total	4,786	100.0%	100.0%	100.0%	100.0%	4,786	100.0%	100.0%	100.0%	100.0%
	SMALL BUSINESS					SMALL FARM				
	By Tract Income									
Low	80	2.8%	3.3%	5.6%	8.4%	0	0.0%	0.0%	1.2%	1.3%
Moderate	522	18.3%	19.7%	16.2%	19.2%	27	14.1%	7.1%	8.4%	8.6%
Middle	1,566	55.0%	50.8%	41.6%	38.4%	149	77.6%	84.1%	58.7%	53.6%
Upper	677	23.8%	26.2%	34.6%	32.9%	16	8.3%	8.8%	29.6%	36.0%
Unknown	0	0.0%	0.0%	0.2%	0.5%	0	0.0%	0.0%	0.2%	0.0%
Total	2,845	100.0%	100.0%	100.0%	100.0%	192	100.0%	100.0%	100.0%	100.0%
	By Revenue									
\$1 Million or Less	2,119	74.5%	63.6%	35.8%	37.7%	191	99.5%	98.4%	82.6%	87.7%
	By Loan Size									
\$100,000 or less	2,247	79.0%	29.1%	93.7%	31.2%	182	94.8%	61.9%	83.4%	36.0%
\$100,001-\$250,000	347	12.2%	23.8%	3.1%	16.5%	8	4.2%	24.4%	12.7%	39.5%
\$250,001-\$1 Million-\$500k (Farm)	251	8.8%	47.1%	3.2%	52.3%	2	1.0%	13.7%	3.8%	24.5%
Total	2,845	100.0%	100.0%	100.0%	100.0%	192	100.0%	100.0%	100.0%	100.0%

Bank and Peer Comparison Table Report

Assessment Area/Group: Wheeling WV-OH MSA 48540

Income Categories	HMDA									
	By Tract Income					By Borrower Income				
	Bank (2005 & 2006)		Peer (2006)			Bank (2005 & 2006)		Peer (2006)		
	#	%	% \$(000s)	%	% \$(000s)	#	%	% \$(000s)	%	% \$(000s)
Home Purchase										
Low	9	1.9%	1.0%	0.3%	0.2%	77	16.5%	7.8%	11.3%	6.5%
Moderate	33	7.1%	3.8%	11.0%	6.9%	100	21.4%	15.1%	21.2%	15.0%
Middle	286	61.1%	57.3%	62.2%	58.4%	80	17.1%	14.6%	22.3%	20.7%
Upper	140	29.9%	37.8%	26.5%	34.4%	170	36.3%	55.0%	32.8%	46.2%
Unknown	0	0.0%	0.0%	0.0%	0.0%	41	8.8%	7.5%	12.3%	11.8%
Total	468	100.0%	100.0%	100.0%	100.0%	468	100.0%	100.0%	100.0%	100.0%
Refinance										
Low	2	0.8%	0.3%	0.2%	0.2%	29	12.1%	5.3%	9.1%	5.0%
Moderate	21	8.8%	8.2%	10.2%	7.2%	43	17.9%	13.7%	17.7%	13.8%
Middle	153	63.8%	55.8%	65.6%	60.1%	55	22.9%	16.9%	23.8%	21.7%
Upper	64	26.7%	35.7%	23.9%	32.5%	97	40.4%	52.2%	36.1%	45.7%
Unknown	0	0.0%	0.0%	0.0%	0.0%	16	6.7%	11.9%	13.4%	13.8%
Total	240	100.0%	100.0%	100.0%	100.0%	240	100.0%	100.0%	100.0%	100.0%
Home Improvement										
Low	5	1.5%	1.1%	0.2%	0.1%	107	31.9%	10.8%	15.2%	11.2%
Moderate	40	11.9%	17.0%	13.2%	11.4%	146	43.6%	21.2%	19.6%	13.7%
Middle	236	70.4%	63.3%	65.5%	64.1%	28	8.4%	18.8%	24.5%	23.2%
Upper	54	16.1%	18.5%	21.1%	24.4%	37	11.0%	36.4%	38.0%	50.1%
Unknown	0	0.0%	0.0%	0.0%	0.0%	17	5.1%	12.9%	2.8%	1.8%
Total	335	100.0%	100.0%	100.0%	100.0%	335	100.0%	100.0%	100.0%	100.0%
HMDA Totals										
Low	16	1.5%	0.8%	0.3%	0.2%	213	20.4%	7.3%	10.9%	6.0%
Moderate	94	9.0%	6.4%	11.0%	7.2%	289	27.7%	15.2%	19.5%	14.3%
Middle	675	64.7%	57.4%	64.0%	59.3%	163	15.6%	15.7%	23.2%	21.1%
Upper	258	24.7%	35.4%	24.7%	33.3%	304	29.1%	52.4%	34.8%	45.9%
Unknown	0	0.0%	0.0%	0.0%	0.0%	74	7.1%	9.4%	11.6%	12.6%
Total	1,043	100.0%	100.0%	100.0%	100.0%	1,043	100.0%	100.0%	100.0%	100.0%
SMALL BUSINESS										
By Tract Income										
Low	56	6.7%	7.5%	2.8%	4.2%	0	0.0%	0.0%	0.0%	0.0%
Moderate	183	22.0%	23.7%	18.6%	23.3%	2	3.6%	2.0%	0.0%	0.0%
Middle	391	47.0%	40.4%	50.6%	45.6%	49	89.1%	94.5%	43.8%	74.9%
Upper	202	24.3%	28.4%	24.4%	24.6%	4	7.3%	3.5%	43.8%	19.7%
Unknown	0	0.0%	0.0%	0.0%	0.0%	0	0.0%	0.0%	0.0%	0.0%
Total	832	100.0%	100.0%	100.0%	100.0%	55	100.0%	100.0%	100.0%	100.0%
By Revenue										
\$1 Million or Less	600	72.1%	61.3%	33.8%	45.1%	55	100.0%	100.0%	93.8%	92.7%
By Loan Size										
\$100,000 or less	691	83.1%	36.4%	96.5%	48.2%	53	96.4%	77.8%	93.8%	75.8%
\$100,001-\$250,000	92	11.1%	26.0%	2.4%	20.7%	2	3.6%	22.2%	6.3%	24.2%
\$250,001-\$1 Million-\$500k (Farm)	49	5.9%	37.6%	1.1%	31.1%	0	0.0%	0.0%	0.0%	0.0%
Total	832	100.0%	100.0%	100.0%	100.0%	55	100.0%	100.0%	100.0%	100.0%

Bank and Peer Comparison Table Report

Assessment Area/Group: Parkersburg-Marietta WV-OH MSA 37620

Income Categories	HMDA									
	By Tract Income					By Borrower Income				
	Bank (2005 & 2006)		Peer (2006)			Bank (2005 & 2006)		Peer (2006)		
	#	%	% \$(000s)	%	% \$(000s)	#	%	% \$(000s)	%	% \$(000s)
	Home Purchase									
Low	0	0.0%	0.0%	0.0%	0.0%	35	16.7%	8.2%	10.0%	5.6%
Moderate	26	12.4%	8.0%	10.7%	7.6%	49	23.4%	15.6%	20.3%	15.4%
Middle	156	74.6%	77.8%	75.6%	75.5%	50	23.9%	20.9%	23.8%	22.4%
Upper	27	12.9%	14.3%	13.5%	16.7%	60	28.7%	45.4%	36.5%	48.3%
Unknown	0	0.0%	0.0%	0.2%	0.2%	15	7.2%	9.9%	9.4%	8.3%
Total	209	100.0%	100.0%	100.0%	100.0%	209	100.0%	100.0%	100.0%	100.0%
	Refinance									
Low	0	0.0%	0.0%	0.0%	0.0%	12	10.8%	4.8%	9.4%	5.4%
Moderate	9	8.1%	7.3%	8.9%	7.3%	23	20.7%	13.4%	18.1%	14.9%
Middle	86	77.5%	76.7%	77.6%	76.7%	31	27.9%	27.7%	26.7%	25.0%
Upper	16	14.4%	15.9%	13.3%	15.8%	40	36.0%	49.9%	35.5%	44.5%
Unknown	0	0.0%	0.0%	0.3%	0.2%	5	4.5%	4.2%	10.3%	10.3%
Total	111	100.0%	100.0%	100.0%	100.0%	111	100.0%	100.0%	100.0%	100.0%
	Home Improvement									
Low	0	0.0%	0.0%	0.0%	0.0%	50	31.4%	8.8%	10.4%	6.4%
Moderate	19	11.9%	12.3%	9.7%	7.5%	73	45.9%	13.2%	20.9%	13.9%
Middle	126	79.2%	68.9%	76.9%	78.5%	17	10.7%	24.9%	29.7%	27.5%
Upper	14	8.8%	18.8%	13.5%	14.0%	16	10.1%	50.0%	35.8%	49.3%
Unknown	0	0.0%	0.0%	0.0%	0.0%	3	1.9%	3.1%	3.3%	2.9%
Total	159	100.0%	100.0%	100.0%	100.0%	159	100.0%	100.0%	100.0%	100.0%
	HMDA Totals									
Low	0	0.0%	0.0%	0.0%	0.0%	97	20.3%	7.2%	9.7%	5.5%
Moderate	54	11.3%	8.2%	9.9%	7.6%	145	30.3%	14.7%	19.4%	15.0%
Middle	368	76.8%	76.6%	76.5%	76.1%	98	20.5%	23.4%	25.6%	23.5%
Upper	57	11.9%	15.2%	13.4%	16.2%	116	24.2%	47.2%	35.9%	46.3%
Unknown	0	0.0%	0.0%	0.2%	0.2%	23	4.8%	7.5%	9.4%	9.6%
Total	479	100.0%	100.0%	100.0%	100.0%	479	100.0%	100.0%	100.0%	100.0%
	SMALL BUSINESS					SMALL FARM				
	By Tract Income									
Low	0	0.0%	0.0%	0.0%	0.0%	0	0.0%	0.0%	0.0%	0.0%
Moderate	68	19.0%	25.7%	22.7%	27.2%	0	0.0%	0.0%	3.8%	1.6%
Middle	253	70.9%	67.1%	62.1%	58.8%	13	86.7%	95.3%	61.5%	36.4%
Upper	36	10.1%	7.2%	11.7%	12.9%	2	13.3%	4.7%	23.1%	38.7%
Unknown	0	0.0%	0.0%	0.0%	0.0%	0	0.0%	0.0%	0.0%	0.0%
Total	357	100.0%	100.0%	100.0%	100.0%	15	100.0%	100.0%	100.0%	100.0%
	By Revenue									
\$1 Million or Less	262	73.4%	68.7%	35.3%	43.7%	15	100.0%	100.0%	69.2%	73.0%
	By Loan Size									
\$100,000 or less	283	79.3%	28.8%	94.0%	33.2%	14	93.3%	39.2%	100.0%	100.0%
\$100,001-\$250,000	42	11.8%	24.0%	3.6%	21.0%	0	0.0%	0.0%	0.0%	0.0%
\$250,001-\$1 Million-\$500k (Farm)	32	9.0%	47.3%	2.4%	45.8%	1	6.7%	60.8%	0.0%	0.0%
Total	357	100.0%	100.0%	100.0%	100.0%	15	100.0%	100.0%	100.0%	100.0%

Bank and Peer Comparison Table Report
Assessment Area/Group: Weirton-Stubenville WV-OH MSA 48260

Income Categories	HMDA									
	By Tract Income					By Borrower Income				
	Bank (2005 & 2006)			Peer (2006)		Bank (2005 & 2006)			Peer (2006)	
	#	%	% \$(000s)	%	% \$(000s)	#	%	% \$(000s)	%	% \$(000s)
Home Purchase										
Low	0	0.0%	0.0%	0.0%	0.0%	14	14.4%	7.5%	9.5%	5.8%
Moderate	3	3.1%	1.2%	5.4%	3.2%	27	27.8%	25.1%	22.8%	18.1%
Middle	85	87.6%	91.4%	89.5%	89.4%	13	13.4%	8.8%	28.2%	26.6%
Upper	9	9.3%	7.5%	5.0%	7.3%	31	32.0%	44.7%	25.4%	35.3%
Unknown	0	0.0%	0.0%	0.1%	0.0%	12	12.4%	14.0%	14.1%	14.1%
Total	97	100.0%	100.0%	100.0%	100.0%	97	100.0%	100.0%	100.0%	100.0%
Refinance										
Low	0	0.0%	0.0%	0.2%	0.1%	4	10.0%	5.5%	7.2%	4.3%
Moderate	0	0.0%	0.0%	3.9%	3.1%	13	32.5%	23.2%	18.0%	14.4%
Middle	35	87.5%	89.3%	91.0%	90.1%	5	12.5%	11.2%	27.2%	24.9%
Upper	5	12.5%	10.7%	4.9%	6.7%	13	32.5%	33.5%	35.6%	43.8%
Unknown	0	0.0%	0.0%	0.0%	0.0%	5	12.5%	26.6%	12.1%	12.5%
Total	40	100.0%	100.0%	100.0%	100.0%	40	100.0%	100.0%	100.0%	100.0%
Home Improvement										
Low	0	0.0%	0.0%	0.0%	0.0%	26	32.5%	17.8%	10.5%	7.7%
Moderate	1	1.3%	0.5%	4.9%	4.0%	34	42.5%	28.3%	19.7%	16.1%
Middle	77	96.3%	98.4%	91.8%	92.4%	4	5.0%	12.1%	26.9%	25.9%
Upper	2	2.5%	1.1%	3.3%	3.6%	13	16.3%	40.1%	40.7%	47.0%
Unknown	0	0.0%	0.0%	0.0%	0.0%	3	3.8%	1.7%	2.2%	3.2%
Total	80	100.0%	100.0%	100.0%	100.0%	80	100.0%	100.0%	100.0%	100.0%
HMDA Totals										
Low	0	0.0%	0.0%	0.1%	0.1%	44	20.3%	7.9%	8.6%	5.2%
Moderate	4	1.8%	0.8%	4.7%	3.2%	74	34.1%	24.9%	20.1%	16.1%
Middle	197	90.8%	91.4%	90.5%	90.0%	22	10.1%	9.7%	27.5%	25.6%
Upper	16	7.4%	7.8%	4.7%	6.7%	57	26.3%	41.3%	32.2%	40.0%
Unknown	0	0.0%	0.0%	0.0%	0.0%	20	9.2%	16.3%	11.6%	13.2%
Total	217	100.0%	100.0%	100.0%	100.0%	217	100.0%	100.0%	100.0%	100.0%
SMALL BUSINESS										
By Tract Income										
Low	0	0.0%	0.0%	0.5%	2.0%	0	0.0%	0.0%	0.0%	0.0%
Moderate	1	0.5%	0.3%	8.3%	10.7%	0	0.0%	0.0%	0.0%	0.0%
Middle	173	90.6%	95.8%	80.1%	79.4%	6	100.0%	100.0%	100.0%	100.0%
Upper	17	8.9%	4.0%	7.9%	7.0%	0	0.0%	0.0%	0.0%	0.0%
Unknown	0	0.0%	0.0%	0.0%	0.0%	0	0.0%	0.0%	0.0%	0.0%
Total	191	100.0%	100.0%	100.0%	100.0%	6	100.0%	100.0%	100.0%	100.0%
SMALL FARM										
By Revenue										
\$1 Million or Less	139	72.8%	58.4%	37.4%	45.5%	6	100.0%	100.0%	75.0%	40.4%
By Loan Size										
\$100,000 or less	145	75.9%	23.7%	96.8%	48.6%	6	100.0%	100.0%	100.0%	100.0%
\$100,001-\$250,000	23	12.0%	18.7%	1.8%	15.8%	0	0.0%	0.0%	0.0%	0.0%
\$250,001-\$1 Million-\$500k (Farm)	23	12.0%	57.6%	1.4%	35.6%	0	0.0%	0.0%	0.0%	0.0%
Total	191	100.0%	100.0%	100.0%	100.0%	6	100.0%	100.0%	100.0%	100.0%

Bank and Peer Comparison Table Report

Assessment Area/Group: All WV

Income Categories	HMDA									
	By Tract Income					By Borrower Income				
	Bank (2005 & 2006)			Peer (2006)		Bank (2005 & 2006)			Peer (2006)	
	#	%	% \$(000s)	%	% \$(000s)	#	%	% \$(000s)	%	% \$(000s)
	Home Purchase									
Low	1	0.1%	0.2%	0.1%	0.3%	95	9.3%	4.3%	7.6%	3.9%
Moderate	74	7.2%	6.0%	8.1%	6.5%	194	18.9%	12.9%	16.6%	10.9%
Middle	494	48.2%	37.2%	51.3%	43.4%	229	22.4%	17.3%	21.9%	18.0%
Upper	455	44.4%	56.6%	40.4%	49.9%	438	42.8%	57.4%	41.9%	53.9%
Unknown	0	0.0%	0.0%	0.0%	0.0%	68	6.6%	8.1%	12.0%	13.3%
Total	1,024	100.0%	100.0%	100.0%	100.0%	1,024	100.0%	100.0%	100.0%	100.0%
	Refinance									
Low	0	0.0%	0.0%	0.1%	0.1%	19	5.4%	2.8%	6.5%	3.2%
Moderate	30	8.5%	6.0%	8.2%	6.8%	46	13.1%	7.0%	15.4%	10.0%
Middle	179	51.0%	40.1%	56.0%	49.8%	79	22.5%	18.3%	22.1%	17.3%
Upper	142	40.5%	54.0%	35.5%	43.1%	181	51.6%	66.4%	44.7%	54.9%
Unknown	0	0.0%	0.0%	0.1%	0.2%	26	7.4%	5.4%	11.3%	14.6%
Total	351	100.0%	100.0%	100.0%	100.0%	351	100.0%	100.0%	100.0%	100.0%
	Home Improvement									
Low	0	0.0%	0.0%	0.0%	0.0%	175	32.3%	10.3%	8.9%	4.8%
Moderate	56	10.4%	5.8%	8.1%	9.3%	226	41.8%	17.5%	18.7%	11.9%
Middle	363	67.1%	50.8%	58.1%	51.0%	43	7.9%	13.6%	24.5%	21.9%
Upper	122	22.6%	43.4%	33.5%	39.3%	72	13.3%	38.9%	45.2%	55.6%
Unknown	0	0.0%	0.0%	0.2%	0.4%	25	4.6%	19.7%	2.7%	5.8%
Total	541	100.0%	100.0%	100.0%	100.0%	541	100.0%	100.0%	100.0%	100.0%
	HMDA Totals									
Low	1	0.1%	0.2%	0.1%	3.9%	289	15.1%	4.4%	7.3%	3.3%
Moderate	160	8.4%	6.0%	8.2%	8.2%	466	24.3%	11.8%	16.2%	9.6%
Middle	1,036	54.1%	38.8%	53.9%	44.8%	351	18.3%	17.3%	22.2%	16.2%
Upper	719	37.5%	55.0%	37.6%	43.1%	691	36.1%	58.1%	43.2%	49.3%
Unknown	0	0.0%	0.0%	0.1%	0.1%	119	6.2%	8.3%	11.1%	21.7%
Total	1,916	100.0%	100.0%	100.0%	100.0%	1,916	100.0%	100.0%	100.0%	100.0%
	SMALL BUSINESS					SMALL FARM				
	By Tract Income									
Low	10	1.0%	1.6%	5.7%	11.0%	0	0.0%	0.0%	0.0%	0.0%
Moderate	108	11.0%	13.1%	11.9%	14.7%	4	8.0%	7.7%	21.6%	15.0%
Middle	547	55.5%	52.3%	44.6%	42.7%	40	80.0%	80.1%	49.0%	55.7%
Upper	320	32.5%	33.0%	32.8%	30.1%	6	12.0%	12.2%	21.6%	27.3%
Unknown	0	0.0%	0.0%	0.0%	0.0%	0	0.0%	0.0%	0.0%	0.0%
Total	985	100.0%	100.0%	100.0%	100.0%	50	100.0%	100.0%	100.0%	100.0%
	By Revenue									
\$1 Million or Less	766	77.8%	65.4%	36.6%	43.4%	50	100.0%	100.0%	70.6%	76.3%
	By Loan Size									
\$100,000 or less	800	81.2%	33.3%	92.9%	30.2%	48	96.0%	70.1%	96.1%	63.2%
\$100,001-\$250,000	112	11.4%	24.1%	3.6%	17.6%	2	4.0%	29.9%	3.9%	36.8%
\$250,001-\$1 Million-\$500k (Farm)	73	7.4%	42.6%	3.5%	52.1%	0	0.0%	0.0%	0.0%	0.0%
Total	985	100.0%	100.0%	100.0%	100.0%	50	100.0%	100.0%	100.0%	100.0%

Bank and Peer Comparison Table Report

Assessment Area/Group: Charleston WV MSA 16620

Income Categories	HMDA									
	By Tract Income					By Borrower Income				
	Bank (2005 & 2006)		Peer (2006)			Bank (2005 & 2006)		Peer (2006)		
	#	%	% \$(000s)	%	% \$(000s)	#	%	% \$(000s)	%	% \$(000s)
Home Purchase										
Low	1	0.4%	1.2%	0.4%	0.7%	35	15.4%	9.5%	12.0%	6.6%
Moderate	27	11.9%	6.3%	6.8%	4.4%	61	26.9%	22.6%	22.4%	16.4%
Middle	128	56.4%	47.9%	60.9%	55.7%	52	22.9%	18.9%	23.3%	21.0%
Upper	71	31.3%	44.6%	32.0%	39.2%	57	25.1%	34.9%	33.0%	46.8%
Unknown	0	0.0%	0.0%	0.0%	0.0%	22	9.7%	14.0%	9.3%	9.2%
Total	227	100.0%	100.0%	100.0%	100.0%	227	100.0%	100.0%	100.0%	100.0%
Refinance										
Low	0	0.0%	0.0%	0.3%	0.3%	4	7.0%	3.0%	7.9%	4.2%
Moderate	10	17.5%	10.9%	8.2%	5.9%	7	12.3%	5.3%	17.2%	11.7%
Middle	29	50.9%	41.7%	61.4%	57.2%	19	33.3%	31.4%	23.2%	19.0%
Upper	18	31.6%	47.4%	30.0%	36.5%	25	43.9%	53.9%	40.8%	52.7%
Unknown	0	0.0%	0.0%	0.0%	0.0%	2	3.5%	6.4%	10.9%	12.4%
Total	57	100.0%	100.0%	100.0%	100.0%	57	100.0%	100.0%	100.0%	100.0%
Home Improvement										
Low	0	0.0%	0.0%	0.0%	0.0%	39	34.5%	13.0%	11.9%	7.6%
Moderate	26	23.0%	10.9%	5.9%	4.0%	37	32.7%	19.2%	18.9%	13.1%
Middle	65	57.5%	42.0%	65.3%	59.5%	15	13.3%	15.4%	27.0%	25.3%
Upper	22	19.5%	47.1%	28.8%	36.5%	15	13.3%	27.2%	39.1%	49.8%
Unknown	0	0.0%	0.0%	0.0%	0.0%	7	6.2%	25.3%	3.1%	4.2%
Total	113	100.0%	100.0%	100.0%	100.0%	113	100.0%	100.0%	100.0%	100.0%
HMDA Totals										
Low	1	0.3%	0.9%	0.3%	9.6%	78	19.6%	8.5%	10.2%	4.8%
Moderate	63	15.9%	7.5%	7.4%	4.7%	105	26.4%	19.0%	19.7%	12.3%
Middle	222	55.9%	46.3%	61.4%	52.2%	86	21.7%	21.1%	23.5%	17.5%
Upper	111	28.0%	45.3%	30.9%	33.5%	97	24.4%	38.2%	36.9%	42.9%
Unknown	0	0.0%	0.0%	0.0%	0.0%	31	7.8%	13.2%	9.7%	22.5%
Total	397	100.0%	100.0%	100.0%	100.0%	397	100.0%	100.0%	100.0%	100.0%
SMALL BUSINESS										
By Tract Income										
Low	10	3.8%	5.9%	12.9%	22.1%	0	0.0%	0.0%	0.0%	0.0%
Moderate	40	15.3%	10.3%	10.9%	14.9%	0	0.0%	0.0%	22.2%	3.6%
Middle	168	64.1%	68.4%	46.1%	40.2%	1	100.0%	100.0%	44.4%	43.4%
Upper	44	16.8%	15.4%	27.5%	22.0%	0	0.0%	0.0%	22.2%	50.6%
Unknown	0	0.0%	0.0%	0.0%	0.0%	0	0.0%	0.0%	0.0%	0.0%
Total	262	100.0%	100.0%	100.0%	100.0%	1	100.0%	100.0%	100.0%	100.0%
SMALL FARM										
By Revenue										
\$1 Million or Less	208	79.4%	72.3%	33.2%	37.7%	1	100.0%	100.0%	55.6%	54.2%
By Loan Size										
\$100,000 or less	208	79.4%	36.6%	91.8%	28.3%	1	100.0%	100.0%	100.0%	100.0%
\$100,001-\$250,000	42	16.0%	32.9%	4.1%	18.2%	0	0.0%	0.0%	0.0%	0.0%
\$250,001-\$1 Million-\$500k (Farm)	12	4.6%	30.5%	4.0%	53.5%	0	0.0%	0.0%	0.0%	0.0%
Total	262	100.0%	100.0%	100.0%	100.0%	1	100.0%	100.0%	100.0%	100.0%

Bank and Peer Comparison Table Report

Assessment Area/Group: Morgantown WV MSA 34060

Income Categories	HMDA									
	By Tract Income					By Borrower Income				
	Bank (2005 & 2006)			Peer (2006)		Bank (2005 & 2006)			Peer (2006)	
	#	%	% \$(000s)	%	% \$(000s)	#	%	% \$(000s)	%	% \$(000s)
	Home Purchase									
Low	0	0.0%	0.0%	0.0%	0.0%	19	9.5%	4.8%	4.4%	2.2%
Moderate	36	17.9%	16.6%	13.7%	10.8%	33	16.4%	10.3%	11.8%	7.4%
Middle	98	48.8%	36.4%	36.5%	31.2%	33	16.4%	12.9%	19.7%	15.2%
Upper	67	33.3%	47.0%	49.8%	58.0%	95	47.3%	58.4%	47.8%	56.7%
Unknown	0	0.0%	0.0%	0.0%	0.0%	21	10.4%	13.6%	16.2%	18.4%
Total	201	100.0%	100.0%	100.0%	100.0%	201	100.0%	100.0%	100.0%	100.0%
	Refinance									
Low	0	0.0%	0.0%	0.0%	0.0%	7	6.8%	3.8%	5.1%	2.3%
Moderate	13	12.6%	9.0%	15.2%	11.5%	20	19.4%	10.3%	15.6%	9.3%
Middle	55	53.4%	36.4%	44.4%	39.0%	27	26.2%	19.2%	21.5%	15.1%
Upper	35	34.0%	54.6%	39.9%	49.0%	43	41.7%	60.9%	43.5%	51.7%
Unknown	0	0.0%	0.0%	0.5%	0.5%	6	5.8%	5.8%	14.3%	21.7%
Total	103	100.0%	100.0%	100.0%	100.0%	103	100.0%	100.0%	100.0%	100.0%
	Home Improvement									
Low	0	0.0%	0.0%	0.0%	0.0%	44	30.8%	8.4%	8.2%	3.3%
Moderate	24	16.8%	7.2%	17.7%	17.7%	65	45.5%	10.9%	17.7%	11.5%
Middle	95	66.4%	46.8%	47.0%	40.7%	12	8.4%	16.1%	26.4%	21.3%
Upper	24	16.8%	46.0%	34.3%	40.5%	15	10.5%	31.2%	44.5%	54.9%
Unknown	0	0.0%	0.0%	0.9%	1.2%	7	4.9%	33.4%	3.2%	9.0%
Total	143	100.0%	100.0%	100.0%	100.0%	143	100.0%	100.0%	100.0%	100.0%
	HMDA Totals									
Low	0	0.0%	0.0%	0.0%	0.0%	70	15.7%	4.9%	5.0%	2.1%
Moderate	73	16.3%	13.4%	14.8%	14.6%	118	26.4%	10.4%	13.7%	7.8%
Middle	248	55.5%	37.6%	40.4%	33.0%	72	16.1%	15.0%	20.9%	14.5%
Upper	126	28.2%	49.0%	44.5%	52.1%	153	34.2%	56.1%	45.5%	51.3%
Unknown	0	0.0%	0.0%	0.3%	0.2%	34	7.6%	13.5%	14.9%	24.2%
Total	447	100.0%	100.0%	100.0%	100.0%	447	100.0%	100.0%	100.0%	100.0%
	SMALL BUSINESS					SMALL FARM				
	By Tract Income									
Low	0	0.0%	0.0%	0.0%	0.0%	0	0.0%	0.0%	0.0%	0.0%
Moderate	53	15.7%	24.6%	18.0%	20.4%	4	16.7%	20.9%	39.1%	26.0%
Middle	199	59.1%	46.0%	38.2%	42.7%	18	75.0%	70.4%	30.4%	66.2%
Upper	85	25.2%	29.4%	38.4%	36.0%	2	8.3%	8.7%	21.7%	4.8%
Unknown	0	0.0%	0.0%	0.0%	0.0%	0	0.0%	0.0%	0.0%	0.0%
Total	337	100.0%	100.0%	100.0%	100.0%	24	100.0%	100.0%	100.0%	100.0%
	By Revenue									
\$1 Million or Less	276	81.9%	62.9%	41.9%	55.0%	24	100.0%	100.0%	78.3%	76.8%
	By Loan Size									
\$100,000 or less	278	82.5%	31.0%	92.1%	30.0%	24	100.0%	100.0%	95.7%	64.7%
\$100,001-\$250,000	30	8.9%	18.7%	3.9%	17.4%	0	0.0%	0.0%	4.3%	35.3%
\$250,001-\$1 Million-\$500k (Farm)	29	8.6%	50.3%	4.0%	52.7%	0	0.0%	0.0%	0.0%	0.0%
Total	337	100.0%	100.0%	100.0%	100.0%	24	100.0%	100.0%	100.0%	100.0%

Bank and Peer Comparison Table Report

Assessment Area/Group: WV Non-MSA

Income Categories	HMDA									
	By Tract Income					By Borrower Income				
	Bank (2005 & 2006)			Peer (2006)		Bank (2005 & 2006)			Peer (2006)	
	#	%	% \$(000s)	%	% \$(000s)	#	%	% \$(000s)	%	% \$(000s)
	Home Purchase									
Low	0	0.0%	0.0%	0.0%	0.0%	41	7.2%	2.4%	4.8%	2.4%
Moderate	11	1.9%	1.1%	4.9%	3.7%	94	16.4%	10.5%	13.0%	7.8%
Middle	250	43.7%	32.2%	49.2%	38.8%	136	23.8%	18.4%	22.0%	17.4%
Upper	311	54.4%	66.7%	45.9%	57.5%	277	48.4%	65.1%	47.9%	59.7%
Unknown	0	0.0%	0.0%	0.0%	0.0%	24	4.2%	3.6%	12.3%	12.8%
Total	572	100.0%	100.0%	100.0%	100.0%	572	100.0%	100.0%	100.0%	100.0%
	Refinance									
Low	0	0.0%	0.0%	0.0%	0.0%	7	3.9%	1.9%	5.9%	2.8%
Moderate	7	3.9%	2.6%	3.6%	3.5%	18	10.0%	5.5%	13.0%	8.4%
Middle	89	49.4%	40.2%	55.3%	47.5%	32	17.8%	14.4%	20.9%	17.2%
Upper	84	46.7%	57.2%	41.1%	48.9%	105	58.3%	73.0%	50.1%	60.3%
Unknown	0	0.0%	0.0%	0.0%	0.0%	18	10.0%	5.2%	10.1%	11.2%
Total	180	100.0%	100.0%	100.0%	100.0%	180	100.0%	100.0%	100.0%	100.0%
	Home Improvement									
Low	0	0.0%	0.0%	0.0%	0.0%	86	34.7%	12.2%	6.6%	3.5%
Moderate	6	2.4%	2.7%	4.2%	5.9%	100	40.3%	22.9%	18.6%	11.7%
Middle	177	71.4%	56.2%	56.0%	52.3%	13	5.2%	10.3%	20.4%	18.9%
Upper	65	26.2%	41.1%	39.8%	41.8%	38	15.3%	51.5%	52.4%	61.8%
Unknown	0	0.0%	0.0%	0.0%	0.0%	11	4.4%	3.0%	2.0%	4.2%
Total	248	100.0%	100.0%	100.0%	100.0%	248	100.0%	100.0%	100.0%	100.0%
	HMDA Totals									
Low	0	0.0%	0.0%	0.0%	0.0%	134	13.4%	2.8%	5.5%	2.4%
Moderate	24	2.4%	1.5%	4.3%	6.4%	212	21.2%	10.0%	13.6%	7.6%
Middle	516	51.6%	35.1%	52.7%	44.8%	181	18.1%	17.1%	21.2%	15.9%
Upper	460	46.0%	63.4%	43.0%	48.7%	420	42.0%	66.1%	49.2%	55.0%
Unknown	0	0.0%	0.0%	0.0%	0.0%	53	5.3%	3.9%	10.5%	19.1%
Total	1,000	100.0%	100.0%	100.0%	100.0%	1,000	100.0%	100.0%	100.0%	100.0%
	SMALL BUSINESS					SMALL FARM				
	By Tract Income									
Low	0	0.0%	0.0%	0.0%	0.0%	0	0.0%	0.0%	0.0%	0.0%
Moderate	15	4.2%	4.9%	8.9%	7.2%	0	0.0%	0.0%	0.0%	0.0%
Middle	151	42.8%	44.1%	44.6%	42.8%	15	83.3%	85.3%	69.2%	34.7%
Upper	187	53.0%	51.0%	37.8%	45.5%	3	16.7%	14.7%	23.1%	64.9%
Unknown	0	0.0%	0.0%	0.0%	0.0%	0	0.0%	0.0%	0.0%	0.0%
Total	353	100.0%	100.0%	100.0%	100.0%	18	100.0%	100.0%	100.0%	100.0%
	By Revenue									
\$1 Million or Less	263	74.5%	62.1%	35.5%	36.5%	18	100.0%	100.0%	69.2%	84.9%
	By Loan Size									
\$100,000 or less	283	80.2%	31.1%	95.5%	35.8%	16	88.9%	44.9%	92.3%	39.6%
\$100,001-\$250,000	39	11.0%	23.5%	2.2%	16.5%	2	11.1%	55.1%	7.7%	60.4%
\$250,001-\$1 Million-\$500k (Farm)	31	8.8%	45.5%	2.3%	47.7%	0	0.0%	0.0%	0.0%	0.0%
Total	353	100.0%	100.0%	100.0%	100.0%	18	100.0%	100.0%	100.0%	100.0%

Bank and Peer Comparison Table Report

Assessment Area/Group: Jackson County WV Non-MSA

Income Categories	HMDA									
	By Tract Income					By Borrower Income				
	Bank (2005 & 2006)			Peer (2006)		Bank (2005 & 2006)			Peer (2006)	
	#	%	% \$(000s)	%	% \$(000s)	#	%	% \$(000s)	%	% \$(000s)
Home Purchase										
Low	0	0.0%	0.0%	0.0%	0.0%	0	0.0%	0.0%	5.2%	3.3%
Moderate	0	0.0%	0.0%	0.0%	0.0%	6	25.0%	15.0%	15.5%	10.6%
Middle	18	75.0%	77.3%	78.4%	74.3%	8	33.3%	30.4%	24.5%	20.4%
Upper	6	25.0%	22.7%	21.6%	25.7%	9	37.5%	51.0%	49.6%	61.1%
Unknown	0	0.0%	0.0%	0.0%	0.0%	1	4.2%	3.5%	5.2%	4.6%
Total	24	100.0%	100.0%	100.0%	100.0%	24	100.0%	100.0%	100.0%	100.0%
Refinance										
Low	0	0.0%	0.0%	0.0%	0.0%	1	9.1%	4.3%	5.0%	2.1%
Moderate	0	0.0%	0.0%	0.0%	0.0%	1	9.1%	3.2%	11.8%	6.7%
Middle	6	54.5%	66.6%	70.9%	67.0%	1	9.1%	4.5%	23.0%	17.8%
Upper	5	45.5%	33.4%	29.1%	33.0%	8	72.7%	88.0%	53.8%	68.0%
Unknown	0	0.0%	0.0%	0.0%	0.0%	0	0.0%	0.0%	6.4%	5.5%
Total	11	100.0%	100.0%	100.0%	100.0%	11	100.0%	100.0%	100.0%	100.0%
Home Improvement										
Low	0	0.0%	0.0%	0.0%	0.0%	6	16.2%	5.6%	5.6%	4.5%
Moderate	0	0.0%	0.0%	0.0%	0.0%	24	64.9%	30.8%	21.3%	7.8%
Middle	26	70.3%	72.4%	70.4%	64.6%	3	8.1%	9.1%	20.4%	19.2%
Upper	11	29.7%	27.6%	29.6%	35.4%	4	10.8%	54.5%	50.9%	67.4%
Unknown	0	0.0%	0.0%	0.0%	0.0%	0	0.0%	0.0%	1.9%	1.1%
Total	37	100.0%	100.0%	100.0%	100.0%	37	100.0%	100.0%	100.0%	100.0%
HMDA Totals										
Low	0	0.0%	0.0%	0.0%	0.0%	7	9.7%	2.2%	5.2%	2.8%
Moderate	0	0.0%	0.0%	0.0%	0.0%	31	43.1%	13.9%	14.6%	8.6%
Middle	50	69.4%	73.2%	74.0%	70.5%	12	16.7%	19.0%	23.3%	19.1%
Upper	22	30.6%	26.8%	26.0%	29.5%	21	29.2%	63.0%	51.6%	64.6%
Unknown	0	0.0%	0.0%	0.0%	0.0%	1	1.4%	1.9%	5.3%	4.9%
Total	72	100.0%	100.0%	100.0%	100.0%	72	100.0%	100.0%	100.0%	100.0%
SMALL BUSINESS										
By Tract Income										
Low	0	0.0%	0.0%	0.0%	0.0%	0	0.0%	0.0%	0.0%	0.0%
Moderate	0	0.0%	0.0%	0.0%	0.0%	0	0.0%	0.0%	0.0%	0.0%
Middle	29	87.9%	91.7%	73.2%	83.1%	6	85.7%	83.9%	83.3%	69.2%
Upper	4	12.1%	8.3%	20.0%	15.7%	1	14.3%	16.1%	16.7%	30.8%
Unknown	0	0.0%	0.0%	0.0%	0.0%	0	0.0%	0.0%	0.0%	0.0%
Total	33	100.0%	100.0%	100.0%	100.0%	7	100.0%	100.0%	100.0%	100.0%
SMALL FARM										
By Revenue										
\$1 Million or Less	19	57.6%	74.8%	43.8%	64.5%	7	100.0%	100.0%	66.7%	64.6%
By Loan Size										
\$100,000 or less	31	93.9%	65.8%	94.9%	32.4%	7	100.0%	100.0%	100.0%	100.0%
\$100,001-\$250,000	1	3.0%	13.8%	2.9%	17.2%	0	0.0%	0.0%	0.0%	0.0%
\$250,001-\$1 Million-\$500k (Farm)	1	3.0%	20.4%	2.2%	50.4%	0	0.0%	0.0%	0.0%	0.0%
Total	33	100.0%	100.0%	100.0%	100.0%	7	100.0%	100.0%	100.0%	100.0%

Bank and Peer Comparison Table Report

Assessment Area/Group: All OH

Income Categories	HMDA									
	By Tract Income					By Borrower Income				
	Bank (2005 & 2006)		Peer (2006)			Bank (2005 & 2006)		Peer (2006)		
	#	%	% \$(000s)	%	% \$(000s)	#	%	% \$(000s)	%	% \$(000s)
Home Purchase										
Low	9	2.0%	1.1%	4.6%	3.5%	68	15.2%	8.5%	9.1%	5.5%
Moderate	81	18.2%	14.0%	16.7%	11.4%	123	27.6%	19.7%	22.3%	16.7%
Middle	244	54.7%	47.2%	45.6%	40.6%	101	22.6%	20.5%	22.0%	19.7%
Upper	112	25.1%	37.8%	33.1%	44.5%	130	29.1%	43.8%	28.5%	41.3%
Unknown	0	0.0%	0.0%	0.0%	0.0%	24	5.4%	7.5%	18.1%	16.8%
Total	446	100.0%	100.0%	100.0%	100.0%	446	100.0%	100.0%	100.0%	100.0%
Refinance										
Low	17	4.6%	8.1%	5.2%	3.9%	38	10.3%	5.1%	8.5%	5.3%
Moderate	62	16.8%	13.0%	19.2%	13.7%	100	27.1%	16.4%	19.5%	15.0%
Middle	186	50.4%	42.5%	46.5%	41.0%	81	22.0%	16.3%	22.8%	20.4%
Upper	104	28.2%	36.4%	29.1%	41.4%	113	30.6%	40.0%	29.7%	40.3%
Unknown	0	0.0%	0.0%	0.0%	0.0%	37	10.0%	22.1%	19.4%	19.0%
Total	369	100.0%	100.0%	100.0%	100.0%	369	100.0%	100.0%	100.0%	100.0%
Home Improvement										
Low	9	3.6%	8.7%	4.4%	3.8%	69	27.5%	9.3%	12.1%	7.9%
Moderate	77	30.7%	13.2%	18.5%	15.0%	120	47.8%	15.7%	25.1%	20.2%
Middle	135	53.8%	34.6%	47.7%	40.8%	26	10.4%	23.8%	25.6%	20.3%
Upper	30	12.0%	43.5%	29.3%	40.3%	25	10.0%	39.6%	34.4%	46.9%
Unknown	0	0.0%	0.0%	0.0%	0.0%	11	4.4%	11.7%	2.8%	4.7%
Total	251	100.0%	100.0%	100.0%	100.0%	251	100.0%	100.0%	100.0%	100.0%
HMDA Totals										
Low	35	3.3%	4.9%	4.8%	4.2%	175	16.4%	7.0%	9.0%	5.3%
Moderate	220	20.6%	13.5%	17.8%	12.5%	343	32.2%	17.9%	21.3%	15.7%
Middle	565	53.0%	44.2%	46.1%	40.9%	208	19.5%	18.8%	22.4%	19.5%
Upper	246	23.1%	37.5%	31.3%	42.5%	268	25.1%	41.8%	29.2%	40.0%
Unknown	0	0.0%	0.0%	0.0%	0.0%	72	6.8%	14.6%	18.1%	19.5%
Total	1,066	100.0%	100.0%	100.0%	100.0%	1,066	100.0%	100.0%	100.0%	100.0%
SMALL BUSINESS										
By Tract Income										
Low	9	2.3%	2.9%	6.3%	8.8%	0	0.0%	0.0%	1.5%	1.4%
Moderate	153	38.4%	31.2%	17.1%	20.1%	21	33.9%	16.4%	7.5%	8.6%
Middle	149	37.4%	33.9%	38.8%	36.5%	37	59.7%	66.8%	58.8%	53.2%
Upper	87	21.9%	32.0%	36.4%	33.7%	4	6.5%	16.8%	31.4%	36.7%
Unknown	0	0.0%	0.0%	0.3%	0.6%	0	0.0%	0.0%	0.2%	0.0%
Total	398	100.0%	100.0%	100.0%	100.0%	62	100.0%	100.0%	100.0%	100.0%
By Revenue										
\$1 Million or Less	296	74.4%	63.2%	35.6%	36.2%	61	98.4%	95.0%	85.0%	88.4%
By Loan Size										
\$100,000 or less	273	68.6%	18.7%	93.4%	30.0%	59	95.2%	67.2%	79.6%	33.2%
\$100,001-\$250,000	63	15.8%	22.6%	3.1%	16.2%	3	4.8%	32.8%	15.5%	40.6%
\$250,001-\$1 Million-\$500k (Farm)	62	15.6%	58.7%	3.4%	53.8%	0	0.0%	0.0%	4.9%	26.1%
Total	398	100.0%	100.0%	100.0%	100.0%	62	100.0%	100.0%	100.0%	100.0%

Bank and Peer Comparison Table Report

Assessment Area/Group: Cincinnati-Middletown OH-KY-IN MSA 17140

Income Categories	HMDA									
	By Tract Income					By Borrower Income				
	Bank (2005 & 2006)			Peer (2006)		Bank (2005 & 2006)			Peer (2006)	
	#	%	% \$(000s)	%	% \$(000s)	#	%	% \$(000s)	%	% \$(000s)
Home Purchase										
Low	4	1.8%	1.1%	5.4%	3.9%	27	12.0%	5.9%	9.7%	5.8%
Moderate	26	11.6%	10.4%	16.7%	12.0%	52	23.1%	16.0%	22.5%	16.1%
Middle	123	54.7%	44.6%	51.7%	42.6%	52	23.1%	21.0%	20.7%	17.4%
Upper	72	32.0%	43.9%	26.1%	41.4%	80	35.6%	49.6%	28.1%	43.1%
Unknown	0	0.0%	0.0%	0.0%	0.1%	14	6.2%	7.5%	19.1%	17.6%
Total	225	100.0%	100.0%	100.0%	100.0%	225	100.0%	100.0%	100.0%	100.0%
Refinance										
Low	6	3.7%	3.7%	5.6%	4.0%	19	11.7%	6.6%	8.6%	5.4%
Moderate	16	9.8%	9.5%	17.2%	12.7%	38	23.3%	18.6%	20.1%	14.8%
Middle	90	55.2%	46.2%	52.0%	43.3%	46	28.2%	27.6%	22.9%	19.1%
Upper	51	31.3%	40.5%	25.2%	40.0%	48	29.4%	38.8%	29.1%	42.0%
Unknown	0	0.0%	0.0%	0.0%	0.0%	12	7.4%	8.4%	19.3%	18.7%
Total	163	100.0%	100.0%	100.0%	100.0%	163	100.0%	100.0%	100.0%	100.0%
Home Improvement										
Low	3	10.0%	2.3%	4.5%	3.5%	6	20.0%	7.8%	11.4%	6.6%
Moderate	3	10.0%	1.0%	15.8%	12.7%	7	23.3%	4.6%	26.0%	18.4%
Middle	16	53.3%	37.0%	51.9%	41.3%	6	20.0%	25.3%	24.9%	19.0%
Upper	8	26.7%	59.7%	27.8%	42.4%	9	30.0%	58.4%	35.4%	51.3%
Unknown	0	0.0%	0.0%	0.0%	0.0%	2	6.7%	3.8%	2.4%	4.7%
Total	30	100.0%	100.0%	100.0%	100.0%	30	100.0%	100.0%	100.0%	100.0%
HMDA Totals										
Low	13	3.1%	2.1%	5.5%	5.0%	52	12.4%	6.2%	9.3%	5.4%
Moderate	45	10.8%	9.6%	16.9%	12.5%	97	23.2%	16.3%	21.6%	15.0%
Middle	229	54.8%	44.8%	51.8%	42.6%	104	24.9%	23.6%	21.7%	17.5%
Upper	131	31.3%	43.5%	25.8%	39.9%	137	32.8%	46.3%	28.8%	41.2%
Unknown	0	0.0%	0.0%	0.0%	0.1%	28	6.7%	7.6%	18.6%	20.8%
Total	418	100.0%	100.0%	100.0%	100.0%	418	100.0%	100.0%	100.0%	100.0%
SMALL BUSINESS										
By Tract Income										
Low	3	5.0%	0.6%	7.1%	8.5%	0	0.0%	0.0%	8.9%	3.8%
Moderate	14	23.3%	37.1%	16.0%	18.6%	0	0.0%	0.0%	0.0%	0.0%
Middle	33	55.0%	42.4%	42.2%	41.4%	0	0.0%	0.0%	44.4%	13.8%
Upper	10	16.7%	19.8%	33.0%	29.8%	1	100.0%	100.0%	42.2%	82.0%
Unknown	0	0.0%	0.0%	0.8%	1.6%	0	0.0%	0.0%	2.2%	0.0%
Total	60	100.0%	100.0%	100.0%	100.0%	1	100.0%	100.0%	100.0%	100.0%
By Revenue										
\$1 Million or Less	40	66.7%	65.4%	36.4%	33.3%	0	0.0%	0.0%	57.8%	41.2%
By Loan Size										
\$100,000 or less	34	56.7%	19.7%	92.1%	26.9%	1	100.0%	100.0%	91.1%	22.9%
\$100,001-\$250,000	12	20.0%	22.5%	3.7%	16.1%	0	0.0%	0.0%	4.4%	26.1%
\$250,001-\$1 Million-\$500k (Farm)	14	23.3%	57.8%	4.2%	57.0%	0	0.0%	0.0%	4.4%	51.0%
Total	60	100.0%	100.0%	100.0%	100.0%	1	100.0%	100.0%	100.0%	100.0%

Bank and Peer Comparison Table Report

Assessment Area/Group: Columbus OH MSA 18140

Income Categories	HMDA									
	By Tract Income					By Borrower Income				
	Bank (2005 & 2006)			Peer (2006)		Bank (2005 & 2006)			Peer (2006)	
	#	%	% \$(000s)	%	% \$(000s)	#	%	% \$(000s)	%	% \$(000s)
Home Purchase										
Low	1	3.3%	1.1%	6.0%	4.5%	6	20.0%	12.9%	9.1%	5.5%
Moderate	5	16.7%	17.3%	16.8%	11.1%	8	26.7%	20.2%	22.3%	17.1%
Middle	14	46.7%	34.4%	40.4%	38.4%	5	16.7%	13.7%	21.8%	19.8%
Upper	10	33.3%	47.1%	36.8%	46.0%	7	23.3%	37.7%	28.3%	40.6%
Unknown	0	0.0%	0.0%	0.0%	0.0%	4	13.3%	15.4%	18.5%	17.0%
Total	30	100.0%	100.0%	100.0%	100.0%	30	100.0%	100.0%	100.0%	100.0%
Refinance										
Low	10	25.6%	26.8%	7.2%	5.3%	2	5.1%	1.8%	8.4%	5.2%
Moderate	12	30.8%	18.7%	20.6%	14.6%	4	10.3%	4.4%	19.2%	14.9%
Middle	12	30.8%	41.7%	40.0%	36.1%	5	12.8%	7.6%	22.6%	20.6%
Upper	5	12.8%	12.7%	32.3%	44.0%	9	23.1%	13.6%	29.4%	39.4%
Unknown	0	0.0%	0.0%	0.0%	0.0%	19	48.7%	72.6%	20.4%	19.9%
Total	39	100.0%	100.0%	100.0%	100.0%	39	100.0%	100.0%	100.0%	100.0%
Home Improvement										
Low	4	10.8%	36.7%	6.0%	4.9%	7	18.9%	2.7%	11.7%	7.9%
Moderate	9	24.3%	16.1%	21.1%	15.6%	23	62.2%	10.5%	25.6%	21.9%
Middle	20	54.1%	11.9%	40.6%	35.9%	3	8.1%	36.8%	26.5%	20.5%
Upper	4	10.8%	35.3%	32.4%	43.6%	2	5.4%	15.3%	32.4%	44.4%
Unknown	0	0.0%	0.0%	0.0%	0.0%	2	5.4%	34.7%	3.8%	5.4%
Total	37	100.0%	100.0%	100.0%	100.0%	37	100.0%	100.0%	100.0%	100.0%
HMDA Totals										
Low	15	14.2%	21.8%	6.5%	5.2%	15	14.2%	4.4%	8.9%	5.3%
Moderate	26	24.5%	18.2%	18.4%	12.6%	35	33.0%	8.5%	21.3%	16.1%
Middle	46	43.4%	37.6%	40.2%	37.6%	13	12.3%	11.3%	22.2%	19.8%
Upper	19	17.9%	22.4%	34.9%	44.7%	18	17.0%	19.2%	28.8%	39.6%
Unknown	0	0.0%	0.0%	0.0%	0.0%	25	23.6%	56.6%	18.8%	19.2%
Total	106	100.0%	100.0%	100.0%	100.0%	106	100.0%	100.0%	100.0%	100.0%
SMALL BUSINESS										
By Tract Income										
Low	5	5.1%	5.3%	7.0%	10.2%	0	0.0%	0.0%	2.9%	0.1%
Moderate	25	25.5%	27.5%	17.1%	18.7%	0	0.0%	0.0%	13.0%	19.8%
Middle	22	22.4%	26.3%	34.8%	34.1%	0	0.0%	0.0%	52.2%	63.6%
Upper	46	46.9%	40.9%	40.0%	36.6%	0	0.0%	0.0%	31.9%	16.5%
Unknown	0	0.0%	0.0%	0.0%	0.0%	0	0.0%	0.0%	0.0%	0.0%
Total	98	100.0%	100.0%	100.0%	100.0%	0	0.0%	0.0%	100.0%	100.0%
By Revenue										
\$1 Million or Less	68	69.4%	59.5%	33.7%	37.4%	0	0.0%	0.0%	72.5%	69.5%
By Loan Size										
\$100,000 or less	46	46.9%	9.5%	94.9%	34.2%	0	0.0%	0.0%	85.5%	35.9%
\$100,001-\$250,000	20	20.4%	18.3%	2.4%	14.6%	0	0.0%	0.0%	13.0%	53.9%
\$250,001-\$1 Million-\$500k (Farm)	32	32.7%	72.2%	2.7%	51.2%	0	0.0%	0.0%	1.4%	10.2%
Total	98	100.0%	100.0%	100.0%	100.0%	0	0.0%	0.0%	100.0%	100.0%

Bank and Peer Comparison Table Report

Assessment Area/Group: Springfield OH MSA 44220

Income Categories	HMDA									
	By Tract Income					By Borrower Income				
	Bank (2005 & 2006)		Peer (2006)		%	Bank (2005 & 2006)		Peer (2006)		%
#	%	% \$(000s)	%	% \$(000s)		#	%	% \$(000s)	%	
	Home Purchase									
Low	4	4.5%	2.3%	1.6%	0.9%	19	21.3%	13.9%	10.3%	7.0%
Moderate	12	13.5%	8.7%	9.9%	6.6%	26	29.2%	25.6%	24.6%	20.5%
Middle	48	53.9%	50.6%	64.1%	61.0%	20	22.5%	19.4%	23.0%	22.7%
Upper	25	28.1%	38.4%	24.4%	31.5%	21	23.6%	32.2%	26.3%	34.8%
Unknown	0	0.0%	0.0%	0.0%	0.0%	3	3.4%	8.9%	15.8%	15.1%
Total	89	100.0%	100.0%	100.0%	100.0%	89	100.0%	100.0%	100.0%	100.0%
	Refinance									
Low	1	1.0%	0.5%	2.2%	1.2%	11	10.6%	4.8%	9.6%	6.3%
Moderate	8	7.7%	4.0%	11.7%	8.0%	37	35.6%	21.8%	18.4%	15.4%
Middle	54	51.9%	39.2%	56.6%	52.7%	17	16.3%	9.4%	25.2%	24.3%
Upper	41	39.4%	56.4%	29.6%	38.1%	37	35.6%	62.6%	27.4%	34.5%
Unknown	0	0.0%	0.0%	0.0%	0.0%	2	1.9%	1.5%	19.4%	19.5%
Total	104	100.0%	100.0%	100.0%	100.0%	104	100.0%	100.0%	100.0%	100.0%
	Home Improvement									
Low	2	3.0%	4.8%	1.9%	1.2%	15	22.7%	13.1%	13.6%	12.1%
Moderate	9	13.6%	11.1%	10.2%	9.0%	34	51.5%	32.9%	24.6%	21.3%
Middle	41	62.1%	51.4%	57.2%	57.7%	5	7.6%	12.1%	24.8%	20.2%
Upper	14	21.2%	32.7%	30.7%	32.1%	10	15.2%	31.6%	35.5%	43.4%
Unknown	0	0.0%	0.0%	0.0%	0.0%	2	3.0%	10.3%	1.5%	2.9%
Total	66	100.0%	100.0%	100.0%	100.0%	66	100.0%	100.0%	100.0%	100.0%
	HMDA Totals									
Low	7	2.7%	1.3%	1.9%	1.0%	45	17.4%	8.3%	10.2%	6.6%
Moderate	29	11.2%	6.0%	10.7%	7.4%	97	37.5%	23.7%	21.7%	17.6%
Middle	143	55.2%	43.8%	60.2%	57.7%	42	16.2%	12.9%	24.1%	22.9%
Upper	80	30.9%	49.0%	27.2%	33.9%	68	26.3%	50.5%	27.4%	34.1%
Unknown	0	0.0%	0.0%	0.0%	0.0%	7	2.7%	4.5%	16.6%	18.8%
Total	259	100.0%	100.0%	100.0%	100.0%	259	100.0%	100.0%	100.0%	100.0%
	SMALL BUSINESS					SMALL FARM				
	By Tract Income									
Low	1	1.5%	3.3%	2.6%	3.2%	0	0.0%	0.0%	0.0%	0.0%
Moderate	7	10.8%	10.8%	14.4%	14.9%	0	0.0%	0.0%	0.7%	1.2%
Middle	31	47.7%	37.4%	52.4%	54.0%	5	62.5%	74.3%	46.1%	42.5%
Upper	26	40.0%	48.5%	28.9%	27.5%	3	37.5%	25.7%	53.3%	56.3%
Unknown	0	0.0%	0.0%	0.0%	0.0%	0	0.0%	0.0%	0.0%	0.0%
Total	65	100.0%	100.0%	100.0%	100.0%	8	100.0%	100.0%	100.0%	100.0%
	By Revenue									
\$1 Million or Less	32	49.2%	53.7%	44.1%	49.7%	8	100.0%	100.0%	90.1%	91.5%
	By Loan Size									
\$100,000 or less	42	64.6%	17.2%	92.2%	34.1%	5	62.5%	28.3%	71.7%	30.5%
\$100,001-\$250,000	15	23.1%	37.5%	4.4%	20.1%	3	37.5%	71.7%	19.1%	34.1%
\$250,001-\$1 Million-\$500k (Farm)	8	12.3%	45.3%	3.4%	45.8%	0	0.0%	0.0%	9.2%	35.5%
Total	65	100.0%	100.0%	100.0%	100.0%	8	100.0%	100.0%	100.0%	100.0%

Bank and Peer Comparison Table Report

Assessment Area/Group: Dayton OH MSA 19380

Income Categories	HMDA									
	By Tract Income					By Borrower Income				
	Bank (2005 & 2006)		Peer (2006)			Bank (2005 & 2006)		Peer (2006)		
	#	%	% \$(000s)	%	% \$(000s)	#	%	% \$(000s)	%	% \$(000s)
Home Purchase										
Low	0	0.0%	0.0%	1.6%	1.1%	4	19.0%	7.9%	8.3%	4.8%
Moderate	0	0.0%	0.0%	16.3%	10.6%	8	38.1%	37.4%	21.5%	16.1%
Middle	16	76.2%	80.9%	45.2%	39.9%	4	19.0%	14.9%	23.6%	22.1%
Upper	5	23.8%	19.1%	37.0%	48.4%	4	19.0%	35.1%	30.2%	41.7%
Unknown	0	0.0%	0.0%	0.0%	0.0%	1	4.8%	4.7%	16.4%	15.3%
Total	21	100.0%	100.0%	100.0%	100.0%	21	100.0%	100.0%	100.0%	100.0%
Refinance										
Low	0	0.0%	0.0%	2.3%	1.5%	2	12.5%	9.8%	8.1%	5.0%
Moderate	2	12.5%	5.6%	19.7%	13.2%	4	25.0%	13.8%	19.3%	15.5%
Middle	7	43.8%	26.4%	47.5%	44.2%	1	6.3%	6.0%	22.6%	21.2%
Upper	7	43.8%	67.9%	30.6%	41.1%	8	50.0%	66.6%	31.7%	40.8%
Unknown	0	0.0%	0.0%	0.0%	0.0%	1	6.3%	3.9%	18.3%	17.5%
Total	16	100.0%	100.0%	100.0%	100.0%	16	100.0%	100.0%	100.0%	100.0%
Home Improvement										
Low	0	0.0%	0.0%	3.1%	2.9%	6	26.1%	2.9%	13.0%	8.9%
Moderate	8	34.8%	11.0%	18.4%	16.8%	12	52.2%	16.2%	22.4%	19.0%
Middle	11	47.8%	23.2%	48.5%	44.3%	0	0.0%	0.0%	26.0%	22.3%
Upper	4	17.4%	65.8%	30.0%	36.1%	3	13.0%	67.8%	36.4%	46.2%
Unknown	0	0.0%	0.0%	0.0%	0.0%	2	8.7%	13.0%	2.2%	3.6%
Total	23	100.0%	100.0%	100.0%	100.0%	23	100.0%	100.0%	100.0%	100.0%
HMDA Totals										
Low	0	0.0%	0.0%	1.9%	1.4%	12	20.0%	7.9%	8.4%	4.8%
Moderate	10	16.7%	4.6%	17.8%	11.8%	24	40.0%	22.8%	20.6%	15.5%
Middle	34	56.7%	45.5%	46.3%	42.1%	5	8.3%	8.1%	23.3%	21.2%
Upper	16	26.7%	49.9%	34.0%	44.8%	15	25.0%	55.4%	31.0%	40.3%
Unknown	0	0.0%	0.0%	0.0%	0.0%	4	6.7%	5.8%	16.6%	18.1%
Total	60	100.0%	100.0%	100.0%	100.0%	60	100.0%	100.0%	100.0%	100.0%
SMALL BUSINESS										
By Tract Income										
Low	0	0.0%	0.0%	4.8%	8.6%	0	0.0%	0.0%	0.7%	4.4%
Moderate	4	16.0%	4.9%	17.0%	24.2%	0	0.0%	0.0%	2.8%	2.0%
Middle	16	64.0%	58.6%	37.6%	27.8%	1	100.0%	100.0%	82.1%	81.2%
Upper	5	20.0%	36.5%	39.1%	39.0%	0	0.0%	0.0%	13.8%	12.2%
Unknown	0	0.0%	0.0%	0.0%	0.0%	0	0.0%	0.0%	0.0%	0.0%
Total	25	100.0%	100.0%	100.0%	100.0%	1	100.0%	100.0%	100.0%	100.0%
By Revenue										
\$1 Million or Less	15	60.0%	88.6%	35.9%	36.0%	1	100.0%	100.0%	92.4%	97.8%
By Loan Size										
\$100,000 or less	15	60.0%	12.8%	92.8%	27.3%	1	100.0%	100.0%	82.8%	43.1%
\$100,001-\$250,000	4	16.0%	16.4%	3.5%	17.7%	0	0.0%	0.0%	15.2%	45.2%
\$250,001-\$1 Million-\$500k (Farm)	6	24.0%	70.8%	3.7%	54.9%	0	0.0%	0.0%	2.1%	11.7%
Total	25	100.0%	100.0%	100.0%	100.0%	1	100.0%	100.0%	100.0%	100.0%

Bank and Peer Comparison Table Report

Assessment Area/Group: OH Non-MSA

Income Categories	HMDA									
	By Tract Income					By Borrower Income				
	Bank (2005 & 2006)		Peer (2006)			Bank (2005 & 2006)		Peer (2006)		
	#	%	% \$(000s)	%	% \$(000s)	#	%	% \$(000s)	%	% \$(000s)
	Home Purchase									
Low	0	0.0%	0.0%	0.0%	0.0%	12	14.8%	13.2%	10.8%	6.3%
Moderate	38	46.9%	44.6%	44.1%	42.5%	29	35.8%	26.9%	22.6%	17.6%
Middle	43	53.1%	55.4%	55.9%	57.5%	20	24.7%	25.9%	23.2%	22.5%
Upper	0	0.0%	0.0%	0.0%	0.0%	18	22.2%	33.0%	24.3%	35.1%
Unknown	0	0.0%	0.0%	0.0%	0.0%	2	2.5%	0.9%	19.0%	18.5%
Total	81	100.0%	100.0%	100.0%	100.0%	81	100.0%	100.0%	100.0%	100.0%
	Refinance									
Low	0	0.0%	0.0%	0.0%	0.0%	4	8.5%	7.0%	10.6%	6.7%
Moderate	24	51.1%	50.9%	39.9%	37.2%	17	36.2%	28.1%	20.7%	16.2%
Middle	23	48.9%	49.1%	60.1%	62.8%	12	25.5%	18.8%	23.9%	22.8%
Upper	0	0.0%	0.0%	0.0%	0.0%	11	23.4%	36.7%	29.5%	36.9%
Unknown	0	0.0%	0.0%	0.0%	0.0%	3	6.4%	9.4%	15.3%	17.4%
Total	47	100.0%	100.0%	100.0%	100.0%	47	100.0%	100.0%	100.0%	100.0%
	Home Improvement									
Low	0	0.0%	0.0%	0.0%	0.0%	35	36.8%	24.4%	14.3%	11.0%
Moderate	48	50.5%	48.0%	41.6%	33.0%	44	46.3%	35.0%	31.4%	25.2%
Middle	47	49.5%	52.0%	62.8%	67.0%	12	12.6%	36.3%	22.4%	17.8%
Upper	0	0.0%	0.0%	0.0%	0.0%	1	1.1%	2.8%	28.7%	40.9%
Unknown	0	0.0%	0.0%	0.0%	0.0%	3	3.2%	1.5%	3.1%	5.1%
Total	95	100.0%	100.0%	100.0%	100.0%	95	100.0%	100.0%	100.0%	100.0%
	HMDA Totals									
Low	0	0.0%	0.0%	0.0%	0.0%	51	22.9%	12.2%	11.0%	6.6%
Moderate	110	49.3%	47.2%	41.6%	38.9%	90	40.4%	28.1%	22.6%	16.9%
Middle	113	50.7%	52.8%	58.4%	61.1%	44	19.7%	24.5%	23.4%	21.9%
Upper	0	0.0%	0.0%	0.0%	0.0%	30	13.5%	31.3%	27.0%	35.4%
Unknown	0	0.0%	0.0%	0.0%	0.0%	8	3.6%	4.0%	16.0%	19.2%
Total	223	100.0%	100.0%	100.0%	100.0%	223	100.0%	100.0%	100.0%	100.0%
	SMALL BUSINESS					SMALL FARM				
	By Tract Income									
Low	0	0.0%	0.0%	0.0%	0.0%	0	0.0%	0.0%	0.0%	0.0%
Moderate	103	68.7%	73.2%	46.4%	52.7%	21	40.4%	33.7%	48.8%	55.8%
Middle	47	31.3%	26.8%	50.5%	45.3%	31	59.6%	66.3%	51.2%	44.2%
Upper	0	0.0%	0.0%	0.0%	0.0%	0	0.0%	0.0%	0.0%	0.0%
Unknown	0	0.0%	0.0%	0.0%	0.0%	0	0.0%	0.0%	0.0%	0.0%
Total	150	100.0%	100.0%	100.0%	100.0%	52	100.0%	100.0%	100.0%	100.0%
	By Revenue									
\$1 Million or Less	141	94.0%	66.0%	41.7%	55.3%	52	100.0%	100.0%	90.2%	99.1%
	By Loan Size									
\$100,000 or less	136	90.7%	51.0%	95.8%	47.5%	52	100.0%	100.0%	75.6%	24.0%
\$100,001-\$250,000	12	8.0%	23.1%	2.8%	21.2%	0	0.0%	0.0%	19.5%	55.2%
\$250,001-\$1 Million-\$500k (Farm)	2	1.3%	25.9%	1.4%	31.3%	0	0.0%	0.0%	4.9%	20.8%
Total	150	100.0%	100.0%	100.0%	100.0%	52	100.0%	100.0%	100.0%	100.0%

Bank and Peer Comparison Table Report

Assessment Area/Group: Pittsburgh PA MSA 38300

Income Categories	HMDA									
	By Tract Income					By Borrower Income				
	Bank (2005 & 2006)			Peer (2006)		Bank (2005 & 2006)			Peer (2006)	
	#	%	% \$(000s)	%	% \$(000s)	#	%	% \$(000s)	%	% \$(000s)
Home Purchase										
Low	0	0.0%	0.0%	0.0%	0.0%	2	8.0%	4.9%	4.1%	1.9%
Moderate	6	24.0%	13.5%	7.3%	3.7%	4	16.0%	9.3%	14.3%	8.3%
Middle	11	44.0%	38.3%	42.3%	35.1%	2	8.0%	1.3%	22.8%	17.9%
Upper	8	32.0%	48.2%	50.4%	61.2%	14	56.0%	62.7%	47.6%	60.5%
Unknown	0	0.0%	0.0%	0.0%	0.0%	3	12.0%	21.8%	11.3%	11.4%
Total	25	100.0%	100.0%	100.0%	100.0%	25	100.0%	100.0%	100.0%	100.0%
Refinance										
Low	0	0.0%	0.0%	0.0%	0.0%	1	7.7%	2.8%	6.5%	3.4%
Moderate	3	23.1%	15.1%	8.1%	4.8%	3	23.1%	5.6%	16.9%	11.9%
Middle	6	46.2%	54.4%	55.3%	48.4%	3	23.1%	17.0%	23.4%	19.5%
Upper	4	30.8%	30.4%	36.6%	46.8%	6	46.2%	74.6%	41.1%	53.4%
Unknown	0	0.0%	0.0%	0.0%	0.0%	0	0.0%	0.0%	12.2%	11.9%
Total	13	100.0%	100.0%	100.0%	100.0%	13	100.0%	100.0%	100.0%	100.0%
Home Improvement										
Low	2	7.4%	4.6%	0.0%	0.0%	4	14.8%	9.2%	11.7%	5.4%
Moderate	4	14.8%	23.0%	8.1%	5.1%	15	55.6%	31.1%	18.8%	11.2%
Middle	19	70.4%	61.1%	60.7%	52.6%	3	11.1%	7.4%	24.9%	21.3%
Upper	2	7.4%	11.3%	31.2%	42.4%	5	18.5%	52.3%	42.9%	59.6%
Unknown	0	0.0%	0.0%	0.0%	0.0%	0	0.0%	0.0%	1.6%	2.4%
Total	27	100.0%	100.0%	100.0%	100.0%	27	100.0%	100.0%	100.0%	100.0%
HMDA Totals										
Low	2	3.1%	0.2%	0.0%	2.8%	7	10.8%	4.3%	5.9%	2.5%
Moderate	13	20.0%	14.6%	7.7%	4.1%	22	33.8%	9.1%	15.8%	9.5%
Middle	36	55.4%	45.2%	49.6%	39.9%	8	12.3%	7.2%	23.2%	18.1%
Upper	14	21.5%	40.0%	42.7%	53.2%	25	38.5%	66.4%	44.3%	56.0%
Unknown	0	0.0%	0.0%	0.0%	0.0%	3	4.6%	13.0%	10.7%	13.9%
Total	65	100.0%	100.0%	100.0%	100.0%	65	100.0%	100.0%	100.0%	100.0%
SMALL BUSINESS										
By Tract Income										
Low	5	6.1%	10.7%	3.0%	1.8%	0	0.0%	0.0%	0.0%	0.0%
Moderate	9	11.0%	8.9%	7.7%	9.2%	0	0.0%	0.0%	9.5%	4.1%
Middle	53	64.6%	47.5%	43.7%	34.8%	4	100.0%	100.0%	71.4%	84.2%
Upper	15	18.3%	33.0%	45.6%	54.2%	0	0.0%	0.0%	19.0%	11.6%
Unknown	0	0.0%	0.0%	0.0%	0.0%	0	0.0%	0.0%	0.0%	0.0%
Total	82	100.0%	100.0%	100.0%	100.0%	4	100.0%	100.0%	100.0%	100.0%
By Revenue										
\$1 Million or Less	56	68.3%	60.9%	39.0%	42.0%	4	100.0%	100.0%	71.4%	69.9%
By Loan Size										
\$100,000 or less	55	67.1%	20.1%	95.9%	47.5%	2	50.0%	22.4%	100.0%	100.0%
\$100,001-\$250,000	15	18.3%	25.3%	2.3%	15.1%	1	25.0%	22.4%	0.0%	0.0%
\$250,001-\$1 Million-\$500k (Farm)	12	14.6%	54.6%	1.8%	37.4%	1	25.0%	55.2%	0.0%	0.0%
Total	82	100.0%	100.0%	100.0%	100.0%	4	100.0%	100.0%	100.0%	100.0%

APPENDIX E

QUALIFIED INVESTMENT TABLE

Assessment Area	Prior Period Investment*		Current Period Investments**		Total Investments		Unfunded Commitments***	
	#	\$ (in 000s)	#	\$ (in 000s)	#	\$ (in 000s)	#	\$ (in 000s)
Wheeling WV-OH MSA 48540	30	8,968	35	1,276	65	10,244	1	33
Parkersburg-Marietta WV-OH MSA 37620	24	2,362	27	285	51	2,647	1	17
Weirton-Steubenville WV-OH MSA 48260	26	3,842	10	169	36	4,011	1	22
Charleston WV MSA 16620	21	3,215	19	35	40	3,250	1	11
Morgantown WV MSA 34060	20	3,765	15	71	35	3,836	1	15
West Virginia Nonmetropolitan	18	3,416	14	18	32	3,434	1	28
Jackson County West Virginia Nonmetropolitan	18	482	5	8	23	490	1	4
Cincinnati-Middletown OH MSA 17140	7	1,259	31	2,581	38	3,840	0	0
Columbus OH MSA 18140	8	979	23	1,368	31	2,347	0	0
Springfield OH MSA 44220	7	724	14	668	21	1,392	0	0
Dayton OH MSA 19380	7	254	9	223	16	477	0	0
Ohio Nonmetropolitan	7	536	8	470	15	1,006	0	0
Pittsburgh, PA MSA 38300	2	1,139	6	1,093	8	2,232	0	0
Regional (****)	1	495	0	0	1	495	0	0

(*) Prior Period Investments mean investments made in a previous evaluation period that are outstanding as of the examination date. Most of the prior investments are allocated among all the assessment areas or assessment areas by state. Therefore, the sum of all the prior period investments by assessment area will total more than the number of aggregate investments.

(**) Most of the current period investments were also allocated among assessment areas; thus, the sum of the current investments will equal more than the number of investments overall.

(***) Unfunded Commitments mean legally binding investment commitments that are tracked and recorded by the bank's financial reporting system. There was only one unfunded commitment for this evaluation period. The commitment was allocated over the assessment areas in West Virginia and promotes economic development.

(****) The bank had a prior period investment in a bond that promotes economic development in Raleigh County, West Virginia. This county is not in WesBanco's assessment area; however, since the bank made at least a satisfactory level of investments within its assessment area, this investment can be included as a qualified community development investment.

APPENDIX F

BRANCH SUMMARY REPORTS

Assessment Group: Overall

Tract Income Category	Branches		ATMs			
	Count	%	Full Service		Cash Only	
			Count	%	Count	%
Low	2	2.6	1	2.9	1	1.4
Moderate	13	16.7	6	17.1	21	28.8
Middle	33	56.4	16	45.7	39	53.4
Upper	19	24.4	12	34.3	12	16.4
Total	78	100.0	35	100.0	73	100.0

Assessment Group: Wheeling WV-OH MSA 48540

Tract Income Category	Branches		ATMs			
	Count	%	Full Service		Cash Only	
			Count	%	Count	%
Low	1	7.1	1	20.0	1	6.3
Moderate	2	14.3	1	20.0	8	50.0
Middle	9	64.3	2	40.0	6	37.5
Upper	2	14.3	1	20.0	1	6.3
Total	14	100.0	5	100.0	16	100.0

Assessment Group: Parkersburg-Marietta WV-OH MSA 37620

Tract Income Category	Branches		ATMs			
	Count	%	Full Service		Cash Only	
			Count	%	Count	%
Low	0	0.0	0	0.0	0	0.0
Moderate	2	28.6	0	0.0	1	14.3
Middle	5	71.4	2	100.0	5	71.4
Upper	0	0.0	0	0	1	14.3
Total	7	100.0	2	100.0	7	100.0

Assessment Group: Weirton-Steubenville WV-OH MSA 48260

Tract Income Category	Branches		ATMs			
	Count	%	Full Service		Cash Only	
			Count	%	Count	%
Low	0	0.0	0	0.0	0	0.0
Moderate	0	0.0	0	0.0	2	22.2
Middle	4	80.0	0	0.0	5	55.6
Upper	1	20.0	0	0.0	2	22.2
Total	5	100.0	0	0.0	9	100.0

Assessment Group: All West Virginia

Tract Income Category	Branches		ATMs			
	Count	%	Full Service		Cash Only	
			Count	%	Count	%
Low	0	0.0	0	0.0	0	0.0
Moderate	4	14.3	1	11.1	6	22.2
Middle	15	53.6	4	44.4	14	51.9
Upper	9	32.1	4	44.4	7	25.9
Total	28	100.0	9	100.0	27	100.0

Assessment Group: Charleston WV MSA 16620

Tract Income Category	Branches		ATMs			
	Count	%	Full Service		Cash Only	
			Count	%	Count	%
Low	0	0.0	0	0.0	0	0.0
Moderate	1	20.0	0	0.0	1	50.0
Middle	3	60.0	2	66.7	1	50.0
Upper	1	20.0	1	33.3	0	0.0
Total	5	100.0	3	100.0	2	100.0

Assessment Group: Morgantown WV MSA 34060

Tract Income Category	Branches		ATMs			
	Count	%	Full Service		Cash Only	
			Count	%	Count	%
Low	0	0.0	0	0.0	0	0.0
Moderate	2	28.6	0	0.0	5	31.3
Middle	3	42.9	1	100.0	6	37.5
Upper	2	28.6	0	0.0	5	31.3
Total	7	100.0	1	100.0	16	100.0

Assessment Group: West Virginia Nonmetropolitan

Tract Income Category	Branches		ATMs			
	Count	%	Full Service		Cash Only	
			Count	%	Count	%
Low	0	0.0	0	0.0	0	0.0
Moderate	1	6.7	1	20.0	0	0.0
Middle	8	53.3	1	20.0	6	75.0
Upper	6	40.0	3	60.0	2	25.0
Total	15	100.0	5	100.0	8	100.0

Assessment Group: Jackson County Nonmetropolitan

Tract Income Category	Branches		ATMs			
	Count	%	Full Service		Cash Only	
			Count	%	Count	%
Low	0	0.0	0	0.0	0	0.0
Moderate	0	0.0	0	0.0	0	0.0
Middle	1	100.0	0	0.0	1	100.0
Upper	0	0.0	0	0.0	0	0.0
Total	1	100.0	0	0.0	1	100.0

Assessment Group: All Ohio

Tract Income Category	Branches		ATMs			
	Count	%	Full Service		Cash Only	
			Count	%	Count	%
Low	0	0.0	0	0.0	0	0.0
Moderate	5	22.7	4	21.1	4	33.3
Middle	10	45.5	8	42.1	7	58.3
Upper	7	31.8	7	36.8	1	8.3
Total	22	100.0	19	100.0	12	100.0

Assessment Group: Cincinnati-Middletown OH-KY-IN MSA 17140

Tract Income Category	Branches		ATMs			
	Count	%	Full Service		Cash Only	
			Count	%	Count	%
Low	0	0.0	0	0.0	0	0.0
Moderate	1	14.3	1	14.3	0	0.0
Middle	4	57.1	4	57.1	0	0.0
Upper	2	28.6	2	28.6	0	0.0
Total	7	100.0	7	100.0	0	0.0

Assessment Group: Columbus OH MSA 18140

Tract Income Category	Branches		ATMs			
	Count	%	Full Service		Cash Only	
			Count	%	Count	%
Low	0	0.0	0	0.0	0	0.0
Moderate	0	0.0	0	0.0	0	0.0
Middle	2	50.0	0	0.0	3	100.0
Upper	2	50.0	2	100.0	0	0
Total	4	100.0	2	100.0	3	100.0

Assessment Group: Springfield OH MSA 44220

Tract Income Category	Branches		ATMs			
	Count	%	Full Service		Cash Only	
			Count	%	Count	%
Low	0	0.0	0	0.0	0	0.0
Moderate	1	25.0	1	20.0	4	66.7
Middle	2	50.0	3	60.0	1	16.7
Upper	1	25.0	1	20.0	1	16.7
Total	4	100.0	5	100.0	6	100.0

Assessment Group: Dayton OH MSA 19380

Tract Income Category	Branches		ATMs			
	Count	%	Full Service		Cash Only	
			Count	%	Count	%
Low	0	0.0	0	0.0	0	0.0
Moderate	0	0.0	0	0.0	0	0.0
Middle	1	33.3	1	33.3	2	100.0
Upper	2	66.7	2	66.7	0	0.0
Total	3	100.0	3	100.0	2	100.0

Assessment Group: Ohio Nonmetropolitan

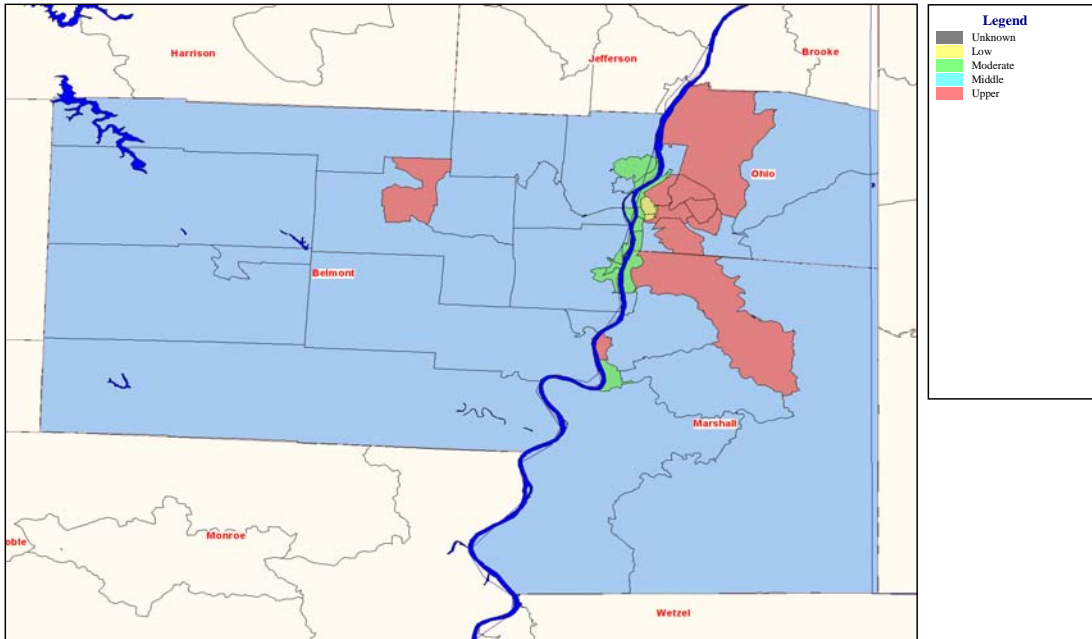
Tract Income Category	Branches		ATMs			
	Count	%	Full Service		Cash Only	
			Count	%	Count	%
Low	0	0.0	0	0.0	0	0.0
Moderate	3	75.0	2	100.0	0	0.0
Middle	1	25.0	0	0.0	1	100.0
Upper	0	0.0	0	0.0	0	0.0
Total	4	100.0	2	100.0	1	100.0

Assessment Group: Pittsburgh PA MSA 38300

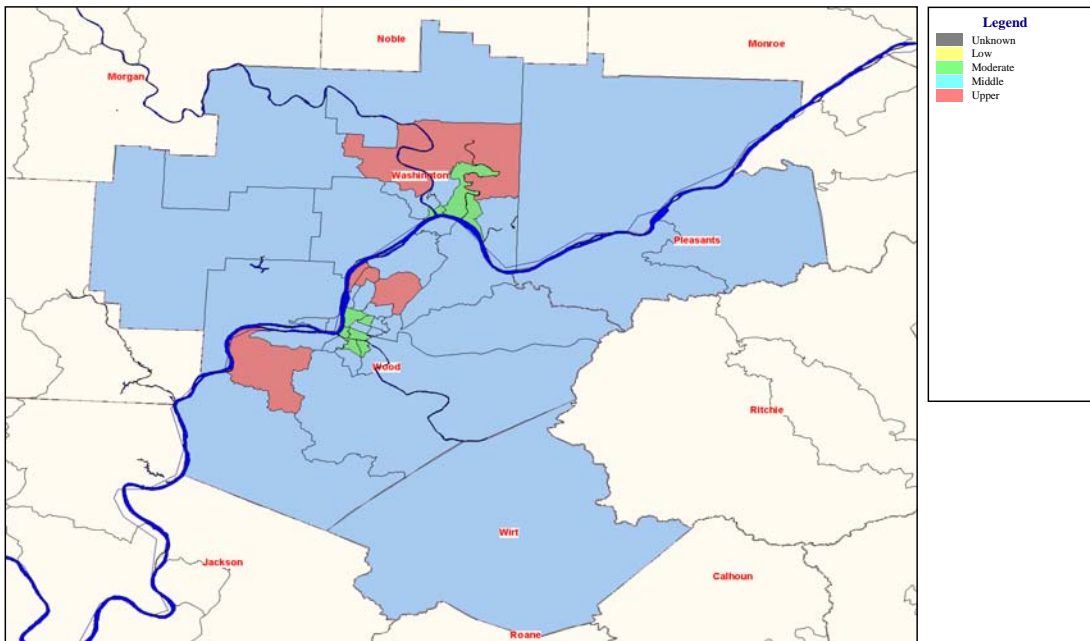
Tract Income Category	Branches		ATMs			
	Count	%	Full Service		Cash Only	
			Count	%	Count	%
Low	1	50.0	0	0.0	0	0.0
Moderate	0	0.0	0	0.0	0	0.0
Middle	1	50.0	0	0.0	2	100.0
Upper	0	0.0	0	0.0	0	0.0
Total	2	100.0	0	0.0	2	100.0

APPENDIX G
ASSESSMENT AREA MAPS

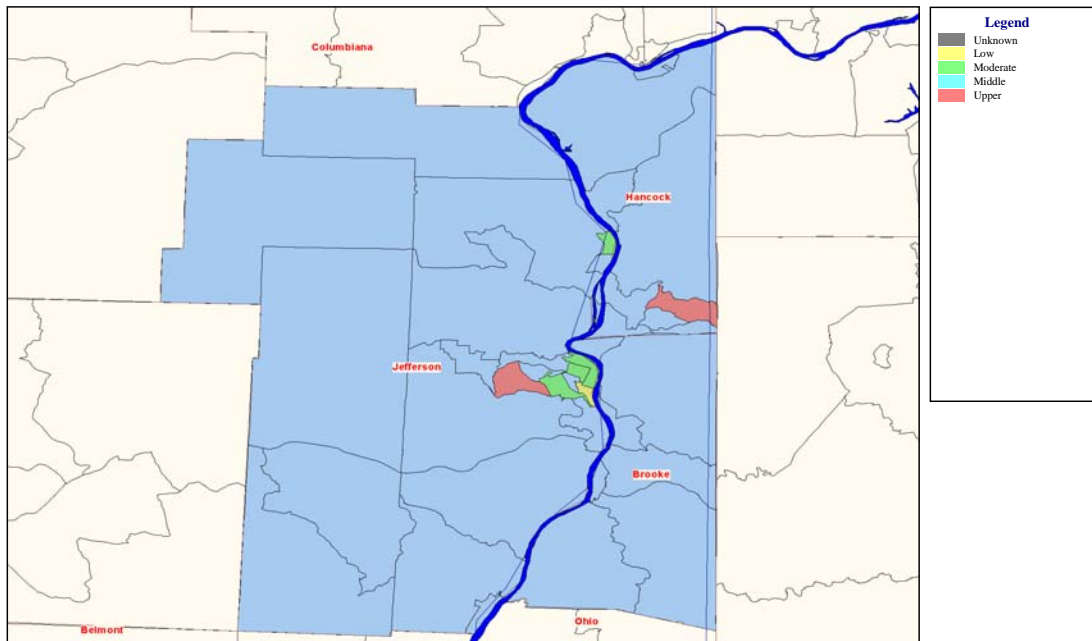
WesBanco Bank
Assessment Area: Wheeling WV-OH MSA 48540



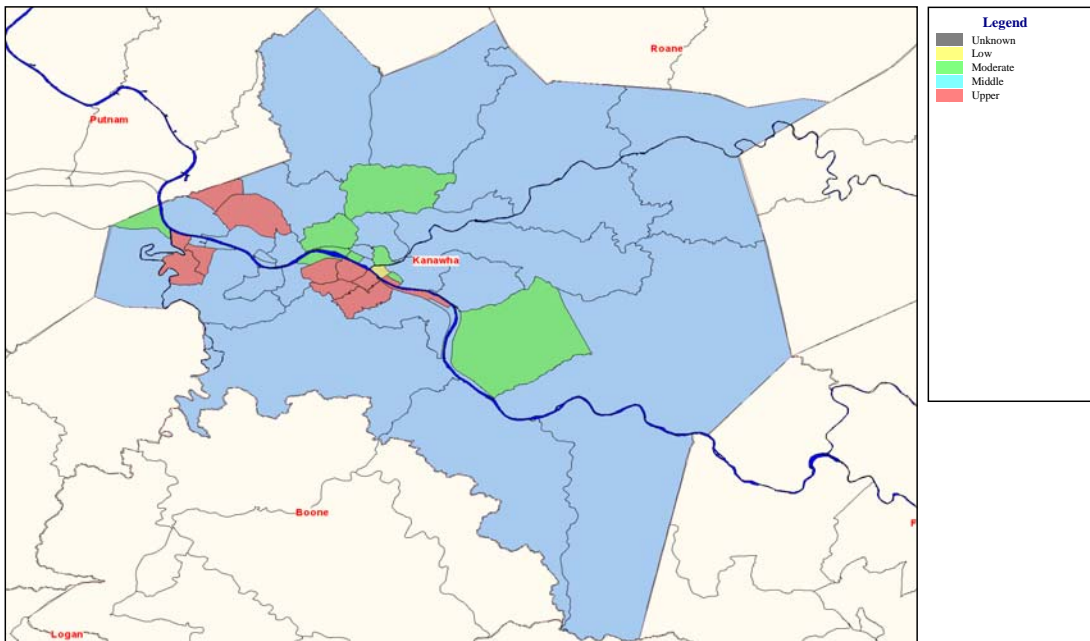
WesBanco Bank
Assessment Area: Parkersburg-Marietta WV-OH MSA 37620



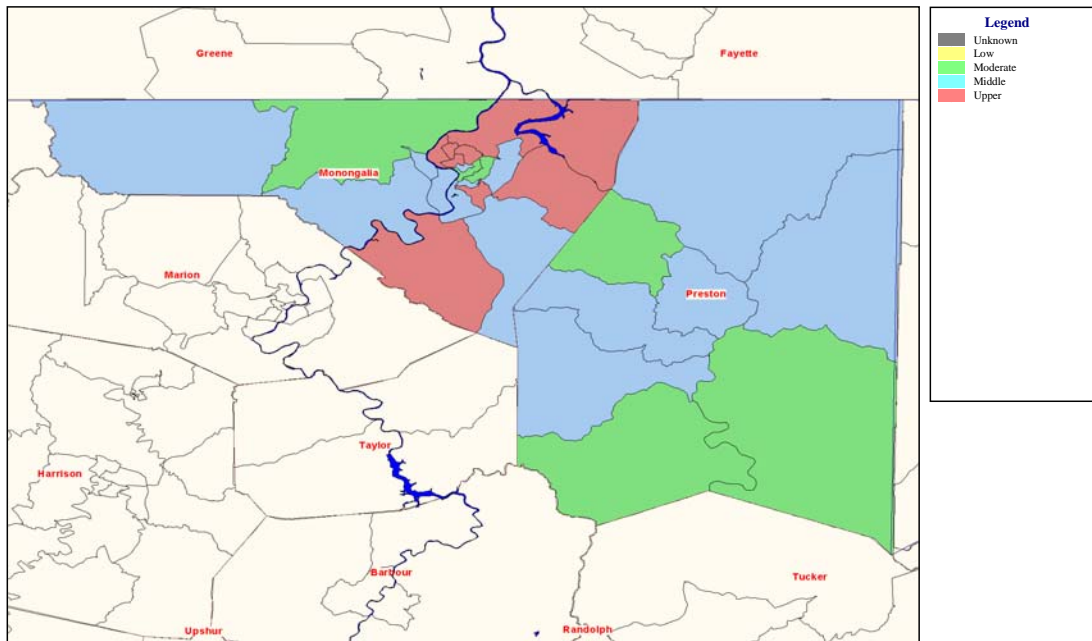
WesBanco Bank
Assessment Area: Weirton-Stubenville WV-OH MSA 48260



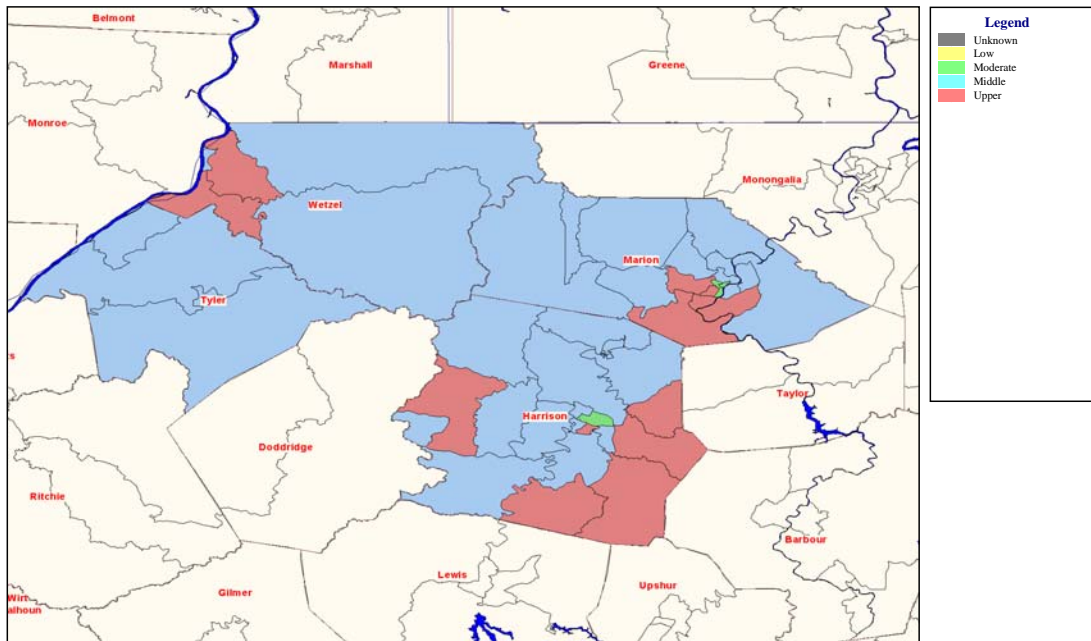
WesBanco Bank
Assessment Area: Charleston WV MSA 16620



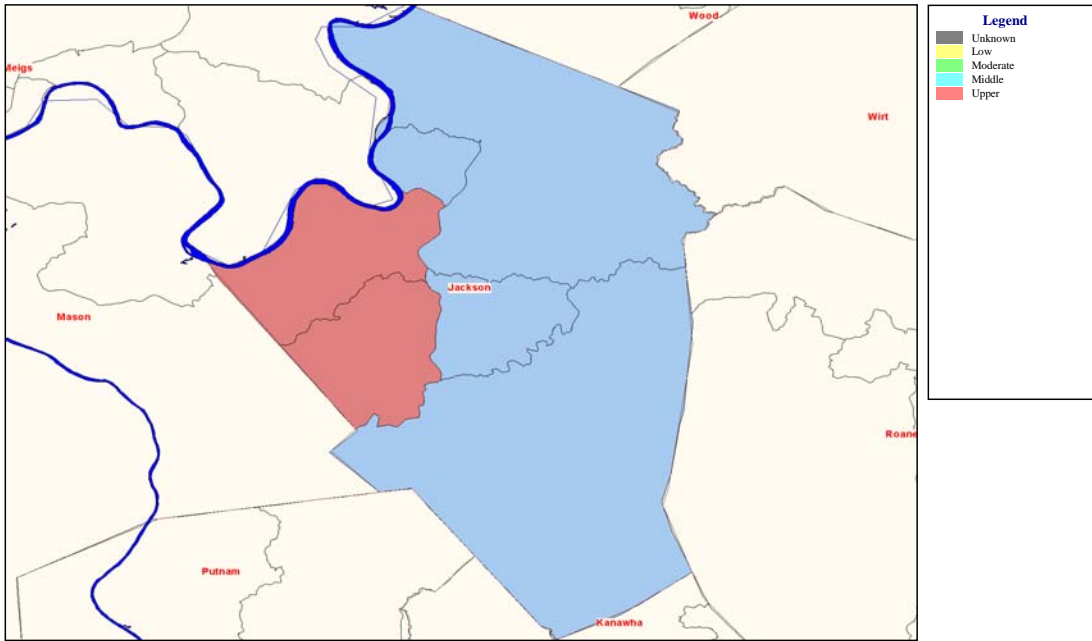
WesBanco Bank
Assessment Area: Morgantown WV MSA 34060



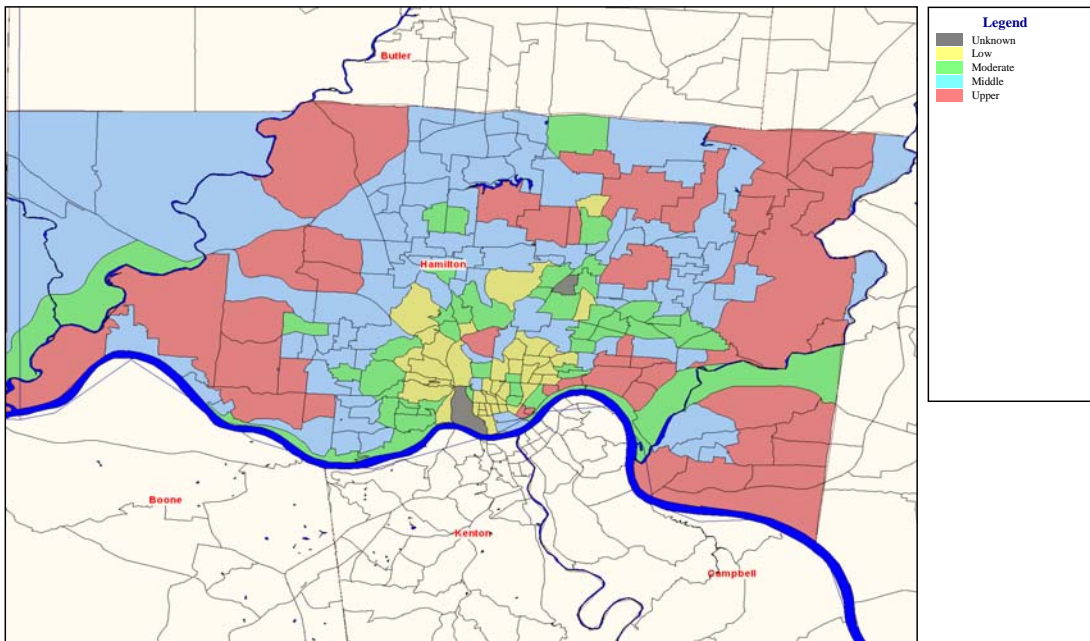
WesBanco Bank
Assessment Area: WV Non-MSA



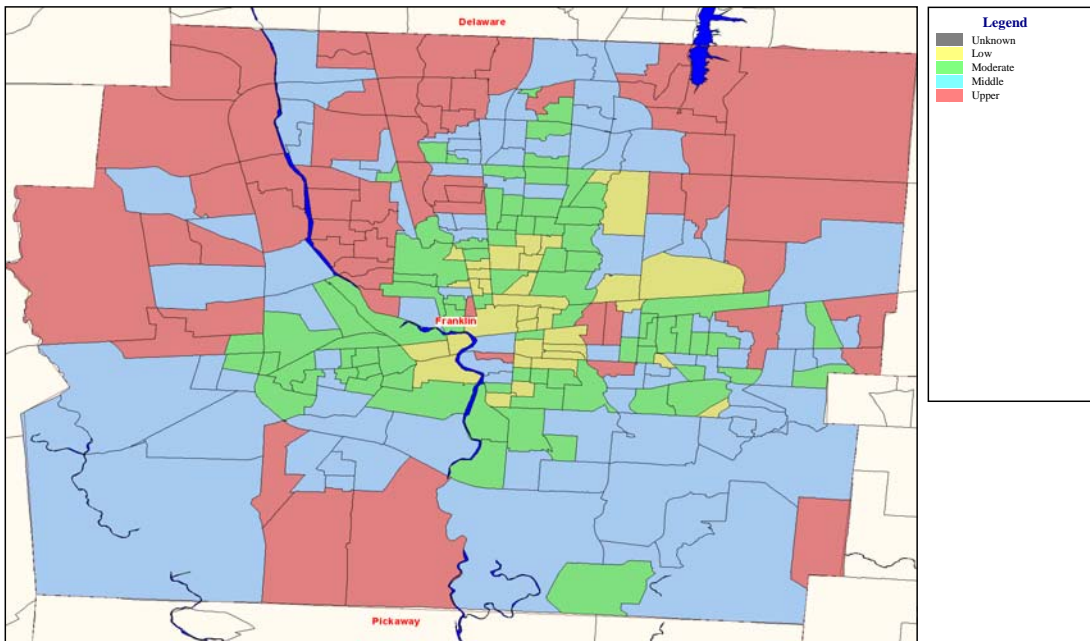
WesBanco Bank
Assessment Area: Jackson County WV Non-MSA



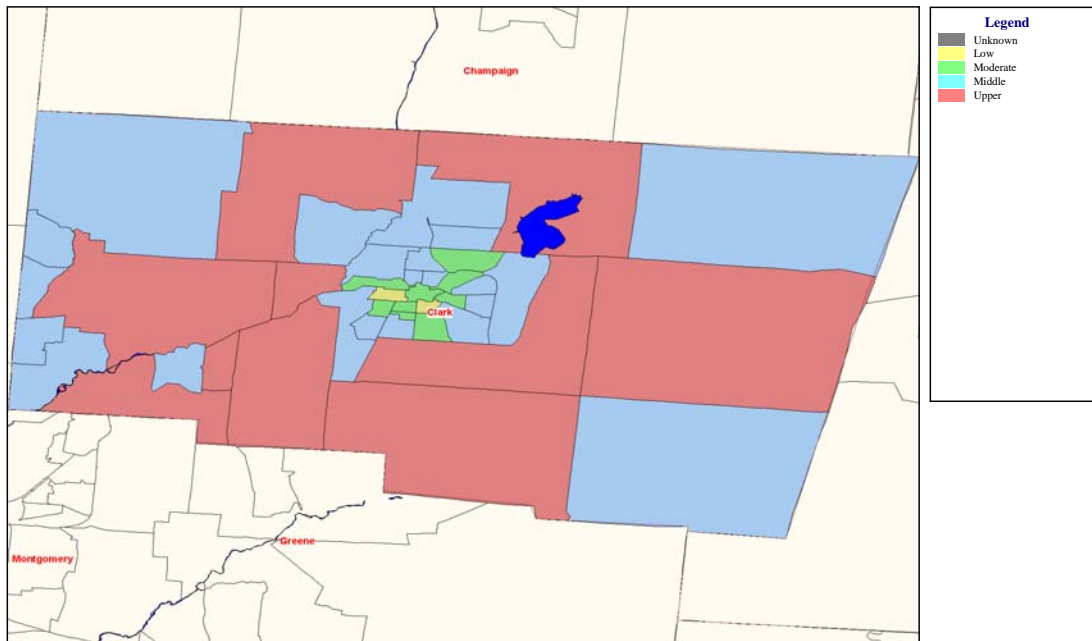
WesBanco Bank
Assessment Area: Cincinnati-Middletown OH-KY-IN MSA 17140



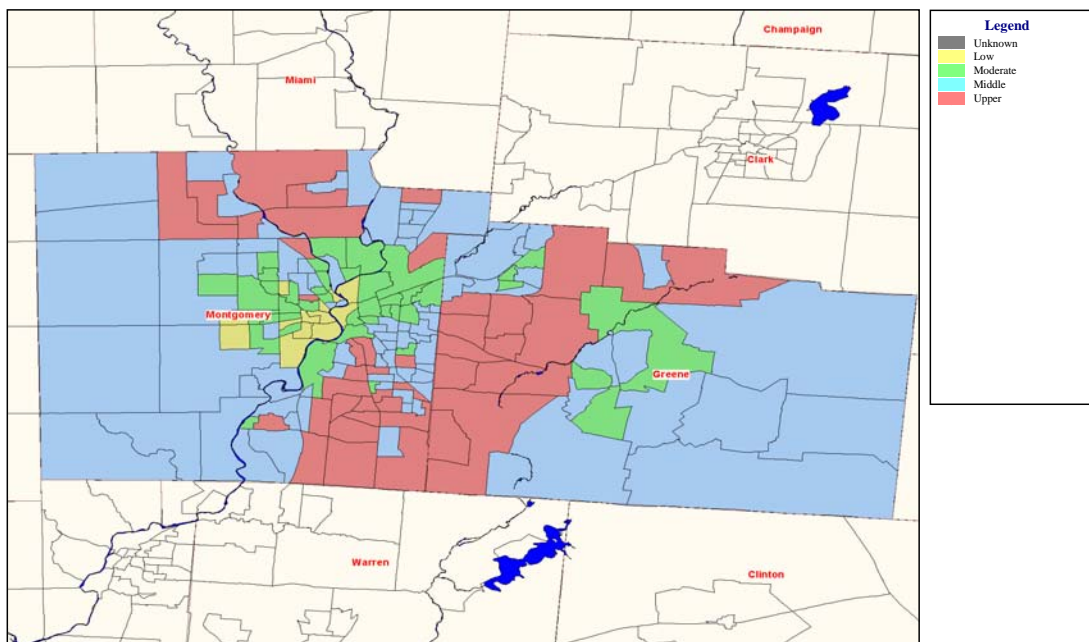
WesBanco Bank
Assessment Area: Columbus OH MSA 18140



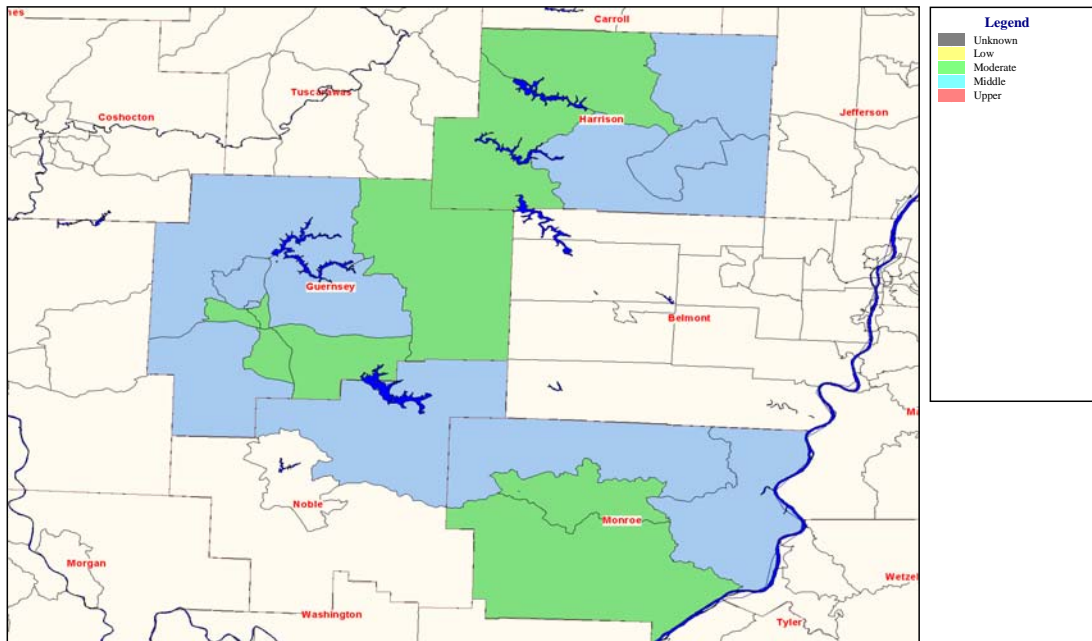
WesBanco Bank
Assessment Area: Springfield OH MSA 44220



WesBanco Bank
Assessment Area: Dayton OH MSA 19380



WesBanco Bank
Assessment Area: OH Non-MSA



WesBanco Bank
Assessment Area: Pittsburgh PA MSA 38300

