# PUBLIC DISCLOSURE 

November 13, 2012

# COMMUNITY REINVESTMENT ACT PERFORMANCE EVALUATION 

City National Bank of West Virginia<br>Charter Number 14807<br>25 Gatewater Road<br>Charleston, West Virginia 25313

Office of the Comptroller of the Currency
4419 Pheasant Ridge Road, Suite 300
Roanoke, Virginia 24014

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

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## Overall CRA Rating

Institution's CRA Rating: This institution is rated Satisfactory.
The following table indicates the performance level of City National Bank of West Virginia with respect to the Lending, Investment, and Service Tests:

|  | City National Bank of West Virginia <br> Performance Tests |  |  |
| :--- | :--- | :--- | :--- |
| Performance Levels | Lending Test* | Investment <br> Test | Service Test |
| Outstanding |  |  | X |
| High Satisfactory | X | X |  |
| Low Satisfactory |  |  |  |
| Needs to Improve |  |  |  |
| Substantial Noncompliance |  |  |  |

*The lending Test is weighted more heavily than the investment and service tests when arriving at an overall rating.

The major factors that support this rating include:

- Lending levels that reflect a good responsiveness to assessment area (AA) credit needs;
- Good distribution of loans among geographies;
- Good distribution of loans among borrowers of different income levels and businesses of different revenue sizes;
- Investments that reflect good responsiveness to AA needs, given the limited community development opportunities and needs of the AA; and
- Services that reflect excellent responsiveness to AA banking needs.


## Definitions and Common Abbreviations

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

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

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

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

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

Effective September 1, 2005, the Board of Governors of the Federal Reserve System, Office of the Comptroller of the Currency, and the Federal Deposit Insurance Corporation have adopted the following additional language as part of the revitalize or stabilize definition of community development. Activities that revitalize or stabilize-
(i) Low-or moderate-income geographies;
(ii) Designated disaster areas; or
(iii) Distressed or underserved nonmetropolitan middle-income geographies designated by the Board, Federal Deposit Insurance Corporation, and Office of the Comptroller of the Currency, based on-
a. Rates of poverty, unemployment, and population loss; or
b. Population size, density, and dispersion. Activities that revitalize and stabilize geographies designated based on population size, density, and dispersion if they help to meet essential community needs, including needs of low- and moderateincome individuals.

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

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

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

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

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

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

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

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

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

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

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

Median Family Income (MFI): The median income determined by the U.S. Census Bureau every ten years and used to determine the income level category of geographies. Also, the median income determined by the Department of Housing and Urban Development annually that is used to determine
the income level category of individuals. For any given area, the median is the point at which half of the families have income above it and half below it.

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

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

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

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

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

Multifamily: Refers to a residential structure that contains five or more units.
Other Products: Includes any unreported optional category of loans for which the institution collects and maintains data for consideration during a CRA examination. Examples of such activity include consumer loans and other loan data an institution may provide concerning its lending performance.

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

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

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

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

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

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

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

## Description of Institution

City National Bank of West Virginia (CNB) is an interstate financial institution with total assets of \$2.9 billion and Tier 1 Capital of $\$ 241$ million as of June 30, 2012. CNB is owned by City Holding Company (CHCO), a one-bank holding company headquartered in Cross Lanes, West Virginia. The bank currently has no other affiliates owned by the holding company. CNB formed a community development corporation in May 2004, but it is inactive.

CNB's primary markets are the Huntington-Ashland, WV-KY-OH Multistate Metropolitan Statistical Area (MSA), the Charleston MSA, and an area of eight contiguous counties in the southeastern part of West Virginia near Beckley, WV. This eight-county area includes Braxton, Fayette, Greenbrier, Mercer, Nicholas, Pocahontas, Raleigh, and Summers Counties.

During the evaluation period, CNB operated 68 full-service branches with 57 in West Virginia, 8 in Kentucky, and 3 in Ohio. CNB closed three branch locations and opened two branch locations during the evaluation period.

CNB provides credit, deposit, investment advisory and insurance products and services. CNB offers internet banking and a telephone voice response system that allows customers to transfer funds, check balances, and conduct other transactions. CNB offers a variety of products and services, including Bounce Back Checking that is designed for people who have had challenges in the past, but who are working to improve their credit rating.

Net loans totaled $\$ 2$ billion, or 71 percent of total assets, as of June 30, 2012. The bank is primarily a real estate lender, with approximately 89 percent of the loan portfolio consisting of real estate secured loans. The primary lending focus is residential mortgage loans. The table below depicts the loan portfolio by loan product as of June 30, 2012.

| Loan Categories as of Review Period Date* |  |  |
| :--- | :--- | :--- |
| TYPE OF LOAN | Balance <br> $(\$ 000 \mathrm{~s})$ | $1,163,377$ |
| 1-4 Family Residential | 582,618 | \% OF TOTAL <br> LOANS |
| Non-Farm/Non-Residential | 136,549 | $28.22 \%$ |
| Commercial \& Industrial | 69.992 | $6.61 \%$ |
| Multi-family Residential | 39,578 | $3.39 \%$ |
| Loans to Individuals | 38,421 | $1.92 \%$ |
| Other | 30,463 | $1.86 \%$ |
| Construction \& Land Development | 3,688 | $1.47 \%$ |
| Farm loans | $\$ 2,064,686$ | $0.18 \%$ |
| Total | $100.00 \%$ |  |

*Schedule RC-C Part 1 - Loans and Leases as reported in the Consolidated Reports of Condition and Income as of June 30, 2012.

There are no legal, financial, or other factors impeding the bank's ability to help meet the credit needs in its AA.

The OCC last evaluated CNB's CRA performance as of November 2, 2009. At that time, the bank received an overall "Satisfactory" rating.

## Scope of the Evaluation

## Evaluation Period/Products Evaluated

This Performance Evaluation assesses the bank's performance under the Lending, Investment, and Service Tests. We reviewed residential mortgage loans subject to filing under HMDA and small loans to businesses in evaluating the bank’s lending performance. We did not consider small loans to farms and multi-family lending in assessing the bank's performance under the Lending Test because loan volumes were not significant enough to perform a meaningful analysis. The bank did not provide optional consumer loan data for consideration under the Lending Test. Consumer loans do not constitute a substantial majority of the bank's business.

The evaluation period for the Lending Test is July 1, 2009 through December 31, 2011. The evaluation period for the Community Development Loans, Services and Investments Tests is November 3, 2009 through November 13, 2012. Any CRA-related activities falling within those time frames were considered in arriving at the CRA rating.

## Data Integrity

CNB's public lending information is accurate. We tested the accuracy of the bank's publicly filed information for home mortgage and small business lending. Testing results validated the effectiveness of the bank's internal processes for collecting, validating, and filing reportable loan data.

We also verified community development loans, investments, and services submitted by bank management to ensure they met the regulatory definition and purpose test for community development. As a result of our analysis, those items that did not meet the definition were not given consideration in our evaluation process.

## Selection of Areas for Full-Scope Review

In each state where the bank has an office, a sample of assessment areas (AAs) within that state was selected for full-scope reviews. Refer to the "Scope" section under each State Rating for details regarding how the areas were selected. Every multistate metropolitan area in which the bank has branches in more than one state received a full-scope review.

## Ratings

The bank's overall rating is a blend of the multistate metropolitan area rating and state ratings. The West Virginia State Rating weighed most heavily in arriving at the overall bank rating due to a substantial majority of deposits and loans being from this rating area. The Kentucky State Rating had relatively little impact on the overall bank rating because such a small percentage of deposits and loans are from this state.

The ratings for the States of West Virginia and Kentucky are based primarily on those areas that received full-scope reviews. Refer to the "Scope" section under each state rating for details regarding how the areas were weighted in arriving at the overall state ratings.

Residential lending received more consideration than lending to small businesses in arriving at conclusions for the Lending Test due to loan volumes over the evaluation period. The analysis of performance under the Investment Test equally considered investment and donation/grant activity. Accessibility to branches, as well as branch hours and services provided, received more weight than community development services in determining Service Test conclusions.

## Fair Lending or Other Illegal Credit Practices Review

Pursuant to 12 C.F.R. 25.28(c), or 12 C.F.R. 195.28(c), in determining a national bank's (bank) or Federal savings association's (FSA) CRA rating, respectively, the OCC considers evidence of discriminatory or other illegal credit practices in any geography by the bank or FSA, or in any assessment area by an affiliate whose loans have been considered as part of the bank's or FSA's lending performance.

We found no evidence of discriminatory or other illegal credit practices inconsistent with helping to meet community credit needs.

## Multistate Metropolitan Area Rating

## Huntington-Ashland, WV-KY-OH Multistate MSA

CRA rating for the Huntington-Ashland, WV-KY-OH Multistate MSA ${ }^{\mathbf{1}}$ :Satisfactory
The lending test is rated: Low Satisfactory
The investment test is rated: Low Satisfactory
The service test is rated: High Satisfactory
The major factors that support this rating include:

- Lending activity that reflects good responsiveness to AA credit needs;
- Adequate distribution of loans among geographies;
- Good distribution of loans by income level of the borrower;
- Investments that reflect adequate responsiveness to AA needs; and
- Services that reflect good responsiveness to AA needs.


## Description of Institution's Operations in the Huntington-Ashland MSA

Please refer to the market profile for the Huntington-Ashland MSA in Appendix C for detailed demographics and other performance context information. The Huntington-Ashland MSA accounts for 16 percent of rated area deposits, 25 percent of rated area number of reported loans, and 19 percent of the total number of branches.

## LENDING TEST

## Conclusions for Area Receiving Full-Scope Reviews

The bank's performance under the lending test in the Huntington-Ashland, WV-KY-OH Multistate MSA is rated High Satisfactory. Based on a full-scope review, the bank's performance in the Huntington-Ashland, WV-KY-OH Multistate MSA is good.

## Lending Activity

Refer to Table 1 Lending Volume in the "Multistate Metropolitan Area(s)" section of Appendix D for the facts and data used to evaluate the bank's lending activity.

Overall lending levels reflect good responsiveness to meeting AA credit needs. CNB ranked number 4 among 26 financial institutions in deposits with an 8.43 percent market share as of June 30, 2012. CNB

[^0]ranked first for home purchase loans, home improvement loans, and home mortgage refinance loans with respective market shares of 9.25 percent, 29.42 percent, and 8.12 percent. Residential lending market shares reflect strong competition with more than 100 residential lenders in the assessment area, most of which are not financial institutions. CNB ranked ninth in making small loans to businesses with a 4.50 percent market share. There are a large number of lenders making small loans to businesses in this AA.

## Distribution of Loans by Income Level of the Geography

The overall geographic distribution of loans by income level was good. The geographic distribution of home mortgage loans by income level was adequate. The geographic distribution of small loans to businesses was good. No unexplained conspicuous gaps were identified. A high percentage of the bank's loan originations were in their AA.

We considered the following factors in evaluating the bank's performance in lending in low-income geographies:

- Only $0.12 \%$ of owner-occupied housing units are located in low-income geographies.
- Only $5.58 \%$ of businesses are located in low-income geographies.


## Home Mortgage Loans

Please refer to Tables 2, 3, 4, and 5 in the "Multistate Metropolitan Area(s)" section of Appendix D for the facts and data used to evaluate the geographic distribution of the bank's home mortgage loan originations and purchases. We considered the demographic characteristics of low- and moderateincome geographies in evaluating geographic distribution of mortgage loans. We placed more weight on performance in moderate-income geographies than in low-income geographies because of significantly fewer opportunities in low-income geographies. There are only three low-income geographies in the AA. Less than 2 percent of the AA population lives in low-income geographies, and only 0.12 percent of the owner-occupied housing units are located in low-income geographies. These factors adversely impact the bank's ability to make mortgage loans to individuals residing in these geographies.

Of the home mortgage loan products, home mortgage refinance loans received the greatest weight, followed by home improvement loans and home purchase loans (equal ranking) and multi-family unit loans. Forty-two percent of the loans originated in the AA were for home mortgage refinance. Thirty percent of loans were for home improvement, and $29 \%$ of loans were for home purchase. Multi-family dwelling units represented one half percent or less of the bank's home mortgage lending activity in the AA.

The overall geographic distribution of home mortgage loans is adequate.
The geographic distribution of home purchase loans is adequate. The bank did not originate or purchase any home purchase loans in low-income geographies. Consequently, the market share is zero. The percentage of loans to borrowers living in moderate-income geographies is somewhat lower than the percentage of owner-occupied units within these geographies. Market share for borrowers in moderateincome geographies is somewhat lower than the overall market share.

The geographic distribution of home improvement loans is adequate. The bank did not originate or purchase any home improvement loans in low-income geographies. Consequently, the market share is zero. The percentage of loans to borrowers living in moderate-income geographies is somewhat lower
than the percentage of owner-occupied units within these geographies. Market share for borrowers in moderate-income geographies is near to the overall market share.

The geographic distribution of home mortgage refinance loans is good. The bank did not originate or purchase any home mortgage refinance loans in low-income geographies. Consequently, the market share is not applicable. The percentage of loans to borrowers living in moderate-income geographies is somewhat lower than the percentage of owner-occupied units within these geographies. Market share for borrowers in moderate-income geographies exceeds the overall market share.

## Small Loans to Businesses

Refer to Table 6 in the "Multistate Metropolitan Area(s)" section of Appendix D for the facts and data used to evaluate the geographic distribution of the bank's origination/purchase of small loans to businesses.

The geographic distribution of small loans to businesses is good. The percentage of loans to businesses in low-income geographies is lower than the percentage of businesses in these geographies. Likewise, market share for businesses in low-income geographies is lower than the overall market share for small loans to businesses. The percentage of loans to businesses in moderate-income geographies exceeds the percentage of businesses in these geographies. Market share for businesses in moderate-income geographies exceeds the overall market share.

## Lending Gap Analysis

A review and analysis of the geographic distribution of CNB's originations of home mortgages and small loans to businesses among AA geographies did not detect any conspicuous or unexplained gaps in CNB's lending patterns.

## Inside/Outside Ratio

The analysis of the bank's lending inside and outside the AAs includes originations and purchases only and was performed at the bank level as opposed to the AA level. We measured and analyzed residential real estate and business loans originated by CNB during the evaluation period. CNB's residential real estate loan originations included loans for purposes of home purchase, home improvement, and home refinance. CNB's residential real estate lending was analyzed using the HMDA data it originated, collected and reported over the period. CNB's business data was analyzed using the CRA data it originated, collected and reported over the period.

A high percentage of the bank's loan originations were in the combined AAs. Overall, 93\% of the total number and $90 \%$ of the total dollar amount of the bank's loan originations were within the AAs. By loan product, $94 \%$ of the total number and $91 \%$ of the total dollar amount of home mortgage loans and $92 \%$ of the total number and $92 \%$ of the total dollar amount of small loans to businesses were inside the bank's AAs.

## Distribution of Loans by Income Level of the Borrower

Overall, CNB's record of lending to borrowers of different incomes is reasonable considering the bank's performance context. This performance meets the standard for satisfactory performance.

## Home Mortgage Loans

Please refer to Tables 8, 9, and 10 in the "Multistate Metropolitan Area(s)" section of Appendix D for the facts and data used to evaluate the borrower distribution of the bank's home mortgage loan originations and purchases. We considered the number of families that live below the poverty level and the barriers this may have on home ownership in evaluating the borrower distribution of home mortgage loans. The 2000 U. S. Census reported that approximately 18 percent of the families in the AA live below the poverty level.

The overall borrower distribution of home mortgage loans is good.
The borrower distribution of home purchase loans is adequate. The percentage of loans to low-income borrowers is significantly lower than the percentage of low-income families in the AA. Market share for low-income borrowers is significantly lower than the overall market share for home purchase loans. The percentage of loans to moderate-income borrowers is near to the percentage of moderate-income families in the AA. The market share for moderate-income borrowers is somewhat lower than the overall market share.

FNB's ability to extend residential mortgage loans to low-income borrowers is affected by AA demographics. For example, 18 percent of households are below poverty level. The borrower distribution of home improvement loans is good. The percentage of loans to low-income borrowers is lower than the percentage of low-income families in the AA. The market share for low-income borrowers is near to the overall market share for home improvement loans. The percentage of loans to moderate-income borrowers exceeds the percentage of moderate-income families in the AA. The market share for moderate-income borrowers is near to the overall market share.

The borrower distribution of home mortgage refinance loans is good. The percentage of loans to lowincome borrowers is lower than the percentage of low-income families in the AA. The market share for low-income borrowers exceeds the overall market share for home mortgage refinance loans. The percentage of loans to moderate-income borrowers is near to the percentage of moderate-income families in the AA. Market share for moderate-income borrowers exceeds the overall market share.

## Small Loans to Businesses

Please refer to Table 11 in the "Multistate Metropolitan Area(s)" section of Appendix D for the facts and data used to evaluate the borrower distribution of the bank's origination/purchase of small loans to businesses.

The borrower distribution of small loans to businesses is excellent. The percentage of small loans to businesses (businesses with annual revenues $\$ 1$ million or less) exceeds the percentage of small businesses in the AA. The market share of small loans to businesses exceeds the overall market share. A substantial majority of small loans to businesses are for amounts of \$100,000 or less.

## Community Development Lending

Please refer to Table 1 Lending Volume in the "Multistate Metropolitan Area(s)" section of Appendix D for the facts and data used to evaluate the bank's level of community development lending. This table includes all community development loans, including multifamily loans that also qualify as community development loans. In addition, Table 5 includes geographic lending data on all multi-family loans,
including those that also qualify as community development loans. Table 5 does not separately list community development loans, however.

Community development lending had a neutral impact on the lending test rating. CNB originated six community development loan totaling approximately \$ 1.9 million during the evaluation period.

## Product Innovation and Flexibility

CNB does not have any innovative or flexible loan products designed to meet the specific credit needs of low- and moderate-income individuals and small businesses. However, certain aspects of the bank's residential lending program benefit low-and moderate-income individuals. These include up to $98 \%$ financing for home purchase loans and a fixed closing cost guarantee. Additionally, CNB offers the Small Business Administration loan guarantee program and actively participates in the West Virginia Housing Development Fund First Time Buyer Program.

## INVESTMENT TEST

Please refer to Table 14 in the "Multistate Metropolitan Area(s)" section of Appendix D for the facts and data used to evaluate the bank's level of qualified investments.
CNB's level of community development investment was adequate. CNB had no qualified investments purchased during the evaluation period for the AA. CNB has investments that are not allocated to any particular AA since the intended benefits have a regional or statewide reach. Please see the comment below under the State of West Virginia rating. CNB also had qualified donations totaling $\$ 75$ thousand during the evaluation period.

CNB is always looking for new qualified investments that would benefit the communities it serves while accommodating the needs of the bank. During the review period, several investment opportunities have been presented to management for review and consideration; however, after careful consideration, it was determined that these investment opportunities did not fit the bank's investment strategy at that time.

## SERVICE TEST

## Conclusions for Areas Receiving Full-Scope Reviews

The bank's performance under the service test is rated High Satisfactory.

## Retail Banking Services

Refer to Table 15 in the "Multistate Metropolitan Area(s)" section of Appendix D for the facts and data used to evaluate the distribution of the bank's branch delivery system and branch openings and closings.

Retail banking services are readily accessible to geographies and individuals of different income levels. The percentage of branches in low-income tracts exceeds the percentage of the population living in these tracts. The percentage of branches in moderate-income tracts is near to the percentage of the population living in these tracts. Most moderate-income tracts are accessible to existing branch locations. CNB opened no new branches, and closed one branch in Barboursville, West Virginia in the multistate MSA during the evaluation period.

Alternative delivery systems include Internet Banking and a telephone voice response system that allows customers to transfer funds, check balances, and conduct other transactions. We did not place significant weight on alternative delivery systems when drawing our performance conclusions due to the lack of data supporting the positive impact on low- and moderate-income geographies and individuals. Products, services, and business hours are reasonable and do not vary from one location to another.

## Community Development Services

CNB provided an adequate level of community development services. Identified community development services included numerous bank employees who provide financial literacy education at public schools and credit counseling and other bank employees who volunteer their financial expertise in the roles of directors or officers for organizations with community development goals.

## State Rating

## State of West Virginia

## CRA Rating for West Virginia ${ }^{2}$ : Satisfactory <br> The lending test is rated: High Satisfactory <br> The investment test is rated: High Satisfactory <br> The service test is rated: Outstanding

The major factors that support this rating include:

- Lending activity that reflects good responsiveness to AA credit needs;
- Good distribution of loans among geographies;
- Good distribution of loans by income level of the borrower;
- Investments that reflect good responsiveness to AA needs; and,
- Services that reflect excellent responsiveness to AA needs.


## Description of Institution's Operations in West Virginia

A substantial majority of the bank's operations are within West Virginia. Seventy-nine percent of the AA deposits and 72 percent of the AA number of reported loans are from West Virginia. Excluding the Huntington-Ashland MSA, 75 percent of the total number of branches is in West Virginia. The two most significant AAs in West Virginia, in terms of loans and deposits, are the Charleston MSA and Beckley Area Non-MSA Counties, both of which received a full-scope review. The Charleston MSA accounts for 35 percent of rated area deposits and 39 percent of rated area loans. The Beckley Area Non-MSA Counties AA accounts for 44 percent of rated area deposits and 38 percent of rated area loans.

Major bank competitors include Branch Banking \&Trust Company (BB\&T), United Bank, and Huntington National Bank. Competition from non-financial institution mortgage and small business lenders is strong.

The West Virginia economy has suffered the ill effects of a shift away from the historically dominant chemical products, mining, primary metals, and glass manufacturing industries. As the economic importance of these industries declined in the U.S., businesses closed, jobs were lost, and many industrial properties were left idle. High paying jobs have, to a significant degree, been replaced by generally lower-paying service and retail jobs. The effects of these changes have been a weakened

[^1]economy, and pockets of high unemployment. Rural Appalachia continues to experience poverty and unemployment rates higher than the state and national averages.

We used a community contact in the Charleston MSA and an additional community contact in the Beckley Area Non MSA Counties in our review. The contacts were an Economic Development Organization and a Community Service Organization respectively.

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

## Scope of Evaluation in West Virginia

The Charleston MSA AA and the eight contiguous counties in Beckley Area Non-MSA AA received full-scope reviews. These two AAs had the highest percentages of loans and deposits in the state. Ratings for West Virginia are based primarily on results of those areas that received full-scope reviews. Refer to Table 1 Lending Volume in the West Virginia section of Appendix D for more information. The following areas received limited-scope reviews:

- Harrison County, West Virginia;
- Jackson and Mason Counties, West Virginia;
- Hagerstown-Martinsburg Multistate MSA (Berkeley and Morgan Counties in West Virginia only); and
- Washington-Arlington-Alexandria Multistate MSA (Jefferson County in West Virginia only).


## LENDING TEST

The distribution of loans by income level of the borrower received greater consideration than the distribution of loans by income level of the geography. This is due to a relatively limited number of low- and moderate-income tracts in the full-scope AAs. There are no low-income tracts in the Beckley Area Non-MSA AA, and 7\% of total tracts are designated as moderate-income. Less than $3 \%$ of the tracts in the Charleston MSA are low-income, and $26 \%$ of total tracts are designated as moderateincome. A majority of low- and moderate-income families live in middle-income tracts in each of these AAs.

## Conclusions for Areas Receiving Full-Scope Reviews

The bank's performance under the lending test in West Virginia is rated High Satisfactory. Based on full-scope reviews, the bank's performance in the Charleston MSA AA is good, and in the Beckley Area Non-MSA AA is good.

## Lending Activity

Please refer to Table 1 Lending Volume in the state of West Virginia section of Appendix D for the facts and data used to evaluate the bank's lending activity.

## Beckley Area Non-MSA AA (Beckley AA)

Overall lending levels in the Beckley AA reflect good responsiveness to meeting AA credit needs. CNB ranked first in deposits with 18.6 percent market share as of June 30, 2012. There are 22 financial institutions with banking offices throughout the AA. CNB ranked fourth for home purchase loans, first for home improvement loans, and second for home mortgage refinance loans with respective market shares of 9.43 percent, 41.92 percent, and 12.44 percent. Residential lending market shares reflect strong competition with more than 100 residential lenders in the assessment area, most of which are not financial institutions. CNB ranked sixth in making small loans to businesses with a 6.49 percent market share. There are a large number of lenders making small loans to businesses in this AA.

## Charleston MSA

Overall lending levels in the Charleston MSA reflect a good responsiveness to meeting AA credit needs. CNB ranked third in deposits with a 10.25 percent market share as of June 30, 2012. There are 23 financial institutions with banking offices throughout the AA. CNB ranked third for home purchase loans, first for home improvement loans, and third for home mortgage refinance loans with respective market shares of 8.66 percent, 35.74 percent, and 8.70 percent. Residential lending market shares reflect strong competition with more than 100 residential lenders in the assessment area, most of which are not financial institutions. CNB ranked number thirteenth in making small loans to businesses with a 3.13 percent market share. There are a large number of lenders making small loans to businesses in this AA.

## Distribution of Loans by Income Level of the Geography

The geographic distribution of CNB's home mortgage loans and small loans to businesses reflects overall good penetration throughout the full scope AA census tracts.

There are no low-income census geographies in the Beckley AA. Therefore, the evaluation of geographic loan distribution in this AA reflects performance in moderate-income geographies, of which there are five.

We considered the demographic characteristics of low- and moderate-income geographies in evaluating geographic distribution of mortgage loans in the Charleston MSA. We placed more weight on performance in moderate-income geographies than in low-income geographies because of significantly fewer opportunities in low-income geographies. There are only two low-income geographies. Fortynine percent of the occupied housing units in these geographies are rental properties. This adversely impacts the bank's ability to make mortgage loans to individuals residing in low-income geographies. We also considered the number of competitors making loans in this market.

## Home Mortgage Loans

The geographic distribution of CNB's home mortgage loans reflects overall good penetration throughout the full scope AA census tracts.

Please refer to Tables 2, 3, 4, and 5 in the state of West Virginia section of Appendix D for the facts and data used to evaluate the geographic distribution of the bank’s home mortgage loan originations or purchases.

## Beckley Area Non-MSA AA

The overall geographic distribution of home mortgage loans in this AA is adequate. Of the home mortgage loan products, home mortgage refinance loans and home improvement loans received equal weight, followed by home purchase loans and multi-family unit loans. Thirty-nine percent of the AA loans were for home refinance and thirty-eight percent of loans were for home improvement loans. Home purchase loans accounted for $22 \%$ of the total home mortgage loans. Multi-family dwelling units represented one half percent or less of the bank's home mortgage lending activity the AA.

The geographic distribution of home purchase loans is good. The percentage of loans to borrowers living in moderate-income geographies is somewhat lower than the percentage of owner-occupied units within these geographies. The market share for borrowers in moderate-income geographies exceeds the overall market share.

The geographic distribution of home improvement loans is poor. The percentage of loans to borrowers living in moderate-income geographies is lower than the percentage of owner-occupied units within these geographies. The market share for borrowers in moderate-income geographies is somewhat lower than the overall market share.

The geographic distribution of home mortgage refinance loans is good. The percentage of loans to borrowers living in moderate-income geographies is somewhat lower than the percentage of owneroccupied units within these geographies. The market share for borrowers in moderate-income geographies exceeds the overall market share.

## Charleston MSA AA

The overall geographic distribution of home mortgage loans in this AA is good. Of the home mortgage loan products, home refinance loans received the greatest weight, followed by home mortgage improvement loans, home purchase loans and multi-family unit loans. Thirty-nine percent of the AA loans were for home refinance. Thirty-three percent of loans were for home improvement, and $27 \%$ of loans were for home purchase. Multi-family dwelling units represented one half percent or less of the bank's home mortgage lending activity in AA.

The geographic distribution of home purchase loans is adequate. The percentage of loans to borrowers living in low-income geographies is lower than the percentage of owner-occupied units within these geographies. The market share for borrowers living in low-income geographies exceeds the overall market share. The percentage of loans to borrowers living in moderate-income geographies is lower than the percentage of owner-occupied units within these geographies. The market share for borrowers in moderate-income geographies is somewhat lower than the overall market share.

The geographic distribution of home improvement loans is good. The percentage of loans to borrowers living in low-income geographies exceeds the percentage of owner-occupied units within these geographies. The market share for borrowers living in low-income geographies is near to the overall market share. The percentage of loans to borrowers living in moderate-income geographies is near to the percentage of owner-occupied units within these geographies. Likewise, the market share for borrowers in moderate-income geographies is near to the overall market share.

The geographic distribution of home mortgage refinance loans is good. The percentage of loans to borrowers living in low-income geographies is somewhat lower than the percentage of owner-occupied
units in these geographies. The market share for borrowers in low-income geographies exceeds the overall market share. The percentage of loans to borrowers living in moderate-income geographies is lower than the percentage of owner-occupied units within these geographies. The market share for borrowers in moderate-income geographies exceeds the overall market share.

## Small Loans to Businesses

The geographic distribution of CNB's small loans to businesses reflects overall good penetration throughout the full scope AA census tracts.

Please refer to Table 6 in the state of West Virginia section of Appendix D for the facts and data used to evaluate the geographic distribution of the bank's origination/purchase of small loans to businesses.

## Beckley Area Non-MSA AA

The geographic distribution of small loans to businesses is adequate. The percentage of loans to businesses in moderate-income geographies is somewhat lower than the percentage of businesses in these geographies. The market share for businesses in moderate-income geographies is somewhat lower than the overall market share.

## Charleston MSA AA

The geographic distribution of small loans to businesses is good. The percentage of loans to businesses in low-income geographies is near to the percentage of businesses in these geographies. The market share for businesses in low-income geographies exceeds the overall market share for small loans to businesses. The percentage of loans to businesses in moderate-income geographies is near to the percentage of businesses in these geographies. The market share for businesses in moderate-income geographies exceeds overall market share.

## Lending Gap Analysis

A review and analysis of the geographic distribution of CNB's originations of home mortgage and small loans to businesses among AA geographies did not detect any conspicuous or unexplained gaps in CNB's lending patterns.

## Inside/Outside Ratio

The analysis of the bank's lending inside and outside the AAs includes originations and purchases only and was performed at the bank level as opposed to the AA level. We measured and analyzed residential real estate and business loans originated by CNB during the evaluation period. CNB's residential real estate loan originations included loans for purposes of home purchase, home improvement, and home refinance. CNB's residential real estate lending was analyzed using the HMDA data it originated, collected and reported over the period. CNB's business data was analyzed using the CRA data it originated, collected and reported over the period.

A high percentage of the bank's loan originations were in the combined AAs. Overall, $93 \%$ of the total number and $90 \%$ of the total dollar amount of the bank's loan originations were within the AAs. By loan product, $94 \%$ of the total number and $91 \%$ of the total dollar amount of home mortgage loans and
$92 \%$ of the total number and $92 \%$ of the total dollar amount of small loans to businesses were inside the bank's AAs.

## Distribution of Loans by Income Level of the Borrower

The borrower distribution of CNB's home mortgage loans, and small loans to businesses reflects an overall good distribution among borrowers of different income levels and businesses of different sizes.

## Home Mortgage Loans

Please refer to Tables 8, 9 and 10 in the state of West Virginia section of Appendix D for the facts and data used to evaluate the borrower distribution of the bank's home mortgage loan originations and purchases.

The borrower distribution of CNB's home mortgage loans reflects an overall good distribution among borrowers of different income levels.

## Beckley Area Non-MSA AA

The overall borrower distribution of home mortgage loans in this AA is adequate.
The borrower distribution of home purchase loans is poor. The percentage of loans to low-income borrowers is significantly lower than the percentage of low-income families in the AA. The market share for low-income borrowers is lower than the overall market share. The percentage of loans to moderate-income borrowers is somewhat lower than the percentage of moderate-income families in the AA. The market share for moderate-income borrowers is somewhat lower than overall market share.

The borrower distribution of home improvement loans is adequate. The percentage of loans to lowincome borrowers is lower than the percentage of low-income families in the AA. The market share for low-income borrowers is somewhat lower than the overall market share. The percentage of loans to moderate-income borrowers is somewhat lower than the percentage of moderate-income families in the AA. Likewise, the market share for moderate-income borrowers is somewhat lower than overall market share.

The borrower distribution of home mortgage refinance loans is adequate. The percentage of loans to low-income borrowers is significantly lower than the percentage of low-income families in the AA. The market share for low-income borrowers is near to the overall market share for home mortgage refinance loans. The percentage of loans to moderate-income borrowers is near to the percentage of moderateincome families in the AA. The market share for moderate-income borrowers is near to the overall market share.

## Charleston MSA AA

The overall borrower distribution of home mortgage loans in this AA is good.
The borrower distribution of home purchase loans is adequate. The percentage of loans to low-income borrowers is lower than the percentage of low-income families in the AA. The market share for lowincome borrowers is lower than the overall market share. The percentage of loans to moderate-income
borrowers exceeds the percentage of moderate-income families in the AA. The market share for moderate-income borrowers is near to the overall market share.

The borrower distribution of home improvement loans is good. The percentage of loans to low-income borrowers is lower than the percentage of low-income families in the AA. The market share for lowincome borrowers is near to the overall market share. The percentage of loans to moderate-income borrowers exceeds the percentage of moderate-income families in the AA. The market share for moderate-income borrowers is near to the overall market share.

The borrower distribution of home mortgage refinance loans is good. The percentage of loans to lowincome borrowers is lower than the percentage of low-income families in the AA. The market share for low-income borrowers is near to the overall market share for home mortgage refinance loans. The percentage of loans to moderate-income borrowers is near to the percentage of moderate-income families in the AA. The market share for moderate-income borrowers exceeds the overall market share.

## Small Loans to Businesses

Please refer to Table 11 in the state of West Virginia section of Appendix D for the facts and data used to evaluate the borrower distribution of the bank's origination and purchase of small loans to businesses.

The borrower distribution of CNB's small loans to businesses reflects an overall good distribution among businesses of different sizes.

## Beckley Area Non-MSA AA

The borrower distribution of small loans to businesses is excellent. The percentage of small loans to businesses (businesses with annual revenues $\$ 1$ million or less) exceeds the percentage of small businesses in the AA. The market share of small loans to businesses exceeds the overall market share. A majority of small loans to businesses are for amounts of $\$ 100,000$ or less.

## Charleston MSA AA

The borrower distribution of small loans to businesses is excellent. The percentage of small loans to businesses (businesses with annual revenues $\$ 1$ million or less) exceeds the percentage of small businesses in the AA. The market share of small loans to businesses exceeds the overall market share. A majority of small loans to businesses are for amounts of $\$ 100,000$ or less.

## Community Development Lending

CNB's level of Community Development (CD) lending had a positive impact on the evaluation of its lending performance in the State of West Virginia.

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

Community development lending had a positive impact on overall performance under the lending test for the Beckley Area Non-MSA AA. CNB originated 17 community development loans totaling \$4.5 million in this AA during the evaluation period. Examples of noteworthy loans include the following:

- Two loans to a regional health care facility that serves primarily low- and moderate-income persons living in middle-income geographies designated as distressed and/or underserved.
- Two loans to two small towns to upgrade the water system.
- Three loans to three public service districts to complete new sewer projects or upgrade the existing sewer system plant.
- One loan to a non-profit entity that distributes food to persons in extreme need.

Community development lending had a neutral impact on the overall performance under the lending test for the Charleston MSA. CNB originated nine community development loans totaling $\$ 50.4$ million (is this million or thousand) during the evaluation period in this AA. Examples of these loans include the following:

- Three loans totaling $\$ 32.4$ million to nursing homes that have been endorsed by the Senior Housing Crime Prevention Foundation (SHCPF) based upon their high percentage of Medicaid assistance.
- One loan in the amount of $\$ 2.5$ million to refinance a loan for upgrading and repairing residential multi-family rental property that provides affordable housing for low- and moderate-income individuals.


## Product Innovation and Flexibility

CNB does not have any innovative or flexible loan products designed to meet the specific credit needs of low- and moderate-income individuals and small businesses. However, certain aspects of the bank's residential lending program benefit low-and moderate-income individuals. These include up to $98 \%$ financing for home purchase loans and a fixed closing cost guarantee. Additionally, CNB offers the Small Business Administration loan guarantee program and actively participates in the West Virginia Housing Development Fund First Time Buyer Program.

## Conclusions for Areas Receiving Limited-Scope Reviews

Based on limited-scope reviews, the bank's performance under the lending test in the Harrison County, Jackson and Mason Counties, Hagerstown-Martinsburg Multistate MSA, and Washington-ArlingtonAlexandria Multistate MSA is not inconsistent with the bank’s overall High Satisfactory performance under the lending test in West Virginia. Please refer to Tables 1 through 13 in the state of West Virginia section of Appendix D for the facts and data that support these conclusions.

## INVESTMENT TEST

## Conclusions for Areas Receiving Full-Scope Reviews

The bank's performance under the investment test in West Virginia is rated High Satisfactory. Based on full-scope reviews, the bank's performance in the Charleston MSA and Beckley AA is good.

CNB is always looking for new qualified investments that would benefit the communities it serves while accommodating the needs of the bank. During the review period, several investment opportunities have
been presented to management for review and consideration; however, after careful consideration, it was determined that these investment opportunities did not fit the bank's investment strategy at that time. Please refer to Table 14 in the state of West Virginia section of Appendix D for the facts and data used to evaluate the bank's level of qualified investments.

## Beckley Area Non-MSA AA

CNB made $\$ 2.4$ million in qualified investments targeted to the Beckley AA during the evaluation period. These were school construction bonds in a distressed and underserved middle income nonmetropolitan area. The bank had an additional $\$ 3.9$ million in prior period investments and $\$ 148$ thousand in qualified donations.

## Charleston MSA AA

CNB made $\$ 6.6$ million in qualified investments targeted to the Charleston MSA during the evaluation period, and did not have any prior period qualified investments targeted to this AA. However, there are statewide and regional investments carried forward during this evaluation period. In addition, the bank had $\$ 422$ thousand in qualified donations in the Charleston MSA.

## West Virginia Regional/Statewide Area

CNB made $\$ 2$ million qualified investments that benefit the larger regional or statewide area during the evaluation period. The bank had $\$ 8.1$ million in prior period investments that carry forward. These investments include low-income housing tax credits, affordable housing mortgage-backed securities, and an equity investment in an organization that targets affordable multi-family housing projects. These investments were not allocated to any particular AA since the intended benefits have a regional or statewide reach. These investments had a positive impact on overall performance under the investment test. None of the investments are considered innovative or complex. The responsiveness to the credit and community development needs of the AA was good.

## Conclusions for Area Receiving Limited-Scope Reviews

CNB made $\$ 1.8$ million in qualified investment in the Hagerstown-Martinsburg Multistate MSA. This consists of two investments for the construction of a waste water treatment plant in Berkeley County. There was $\$ 5.2$ million in prior period qualified investments for this AA. Based on limited-scope reviews, the bank's performance under the investment test in this MSA and the Harrison County, Jackson and Mason Counties, and Washington-Arlington-Alexandria Multistate MSA is not inconsistent with the bank’s overall High Satisfactory performance under the investment test in West Virginia. In addition, the bank had $\$ 30$ thousand in qualified donations in these AAs. Please refer to Table 14 in the state of West Virginia section of Appendix D for the facts and data that support these conclusions.

## SERVICE TEST

## Conclusions for Areas Receiving Full-Scope Reviews

The bank's performance under the service test in West Virginia is rated Outstanding. Based on fullscope reviews, the bank's performance in the Charleston MSA and Beckley AA is excellent.

## Retail Banking Services

Please refer to Table 15 in the state of West Virginia section of Appendix D for the facts and data used to evaluate the distribution of the bank's branch delivery system and branch openings and closings.

Retail banking services in the Beckley AA are readily accessible to geographies and individuals of different income levels. The percentage of branches in moderate-income tracts exceeds the percentage of the population living in these tracts. There are no low-income tracts in the Beckley AA. The bank did not open or close any branches in this AA during the evaluation period.

Retail banking services in the Charleston MSA AA are readily accessible to geographies and individuals of different income levels. There are no branches located in low-income tracts where only $1.70 \%$ of the AA population resides. The percentage of branches in moderate-income tracts exceeds the percentage of the population living in these tracts. Most moderate-income tracts are accessible to existing branch locations. The bank opened one branch and closed no branches during the evaluation period. The opened branch is located in South Charleston, Kanawha County in a middle-income tract.

Alternative delivery systems include Internet Banking and a telephone voice response system that allows customers to transfer funds, check balances, and conduct other transactions. We did not place significant weight on alternative delivery systems when drawing our performance conclusions due to the lack of data supporting the positive impact on low- and moderate-income geographies and individuals.

CNB offers a wide range of products and services throughout its West Virginia AAs. Branch hours are tailored to meet AA needs. Products, services, and business hours are reasonable and do not materially vary from one location to another.

## Community Development Services

CNB provided an excellent level of community development services in the Beckley Area Non-MSA AA and the Charleston MSA AA. Identified community development services in the Beckley AA included: numerous school savings programs and financial literacy training taking place at 19 different public schools and other civic organizations. Several bank employees volunteer their financial expertise in the roles of directors or officers for organizations with community development goals. Identified community development services in the Charleston MSA AA included:

- Finance Committee member of the Tri-County YMCA. The YMCA provides daycare services and activities that can benefit low income families and disadvantaged children through their financial assistance membership program.
- Family Selection Committee Member of the Huntington Area Habitat for Humanity. The Committee reviews potential new Habitat home owner applications in preparation for home award recipients. Financial expertise is used in qualifying potential candidates.
- Financial literacy events - Many of the services offered are from bank employees who provide financial literacy education at public schools, including those schools where more than $50 \%$ of the students qualify for free or reduced-price lunch programs based on low family incomes.


## Conclusions for Areas Receiving Limited-Scope Reviews

Based on limited-scope reviews, the bank's performance under the service test in the HagerstownMartinsburg Multistate MSA, Harrison County, Jackson and Mason Counties, and Washington-Arlington-Alexandria Multistate MSA is not inconsistent with the bank's overall Outstanding performance under the service test in West Virginia. Please refer to Table 15 in the state of West Virginia section of Appendix D for the facts and data that support these conclusions.

## State Rating

## State of Kentucky

CRA Rating for Kentucky ${ }^{3}$ :<br>The lending test is rated:<br>The investment test is rated:<br>The service test is rated:<br>Satisfactory<br>High Satisfactory<br>Low Satisfactory<br>Low Satisfactory

The major factors that support this rating include:

- A good distribution of loans by income level of the borrower;
- Investments that reflect adequate responsiveness to AA needs; and
- Services that reflect adequate responsiveness to AA needs.


## Description of Institution's Operations in Kentucky

A smaller percentage of the bank's operations are in Kentucky. Five percent of the AA deposits and 3 percent of the AA number of reported loans are from Kentucky. Excluding the Huntington-Ashland MSA, only 4 percent of the total number of branches is in Kentucky. For the two AAs in Kentucky, Johnson County accounts for 84 percent of rated area deposits and 71 percent of rated area loans. Carter County accounts for 16 percent of rated area deposits and 29 percent of rated area loans. Two of the three branches in Kentucky are in Johnson County.

Major bank competitors include Citizens National Bank of Paintsville, Commercial Bank of Grayson, and First National Bank of Grayson. Competition from non-financial institution mortgage and small business lenders is strong.

The bank’s Kentucky AAs are located in the heart of rural Appalachia. Carter and Johnson Counties are approximately 75 miles apart. Mining once dominated the area. We reviewed one community contact in Kentucky. This contact is a Community Service Organization. Rural Appalachia continues to experience poverty and unemployment rates higher than the state and national averages.

Please refer to the market profiles for the state of Kentucky in Appendix C for detailed demographics and other performance context information for assessment areas that received full-scope reviews.

## Scope of Evaluation in Kentucky

Johnson County received a full-scope review based on the high percentage of AA loans and deposits, and the number of branch locations. Ratings for Kentucky are based primarily on results of this full-

3 For institutions with branches in two or more states in a multistate metropolitan area, this statewide evaluation does not reflect performance in the parts of this state 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.
scope review. Carter County received a limited-scope review. Please refer to Table 1 Lending Volume in the Kentucky section of Appendix D for more information.

## LENDING TEST

Conclusions for Areas Receiving Full-Scope Reviews
The bank's performance under the lending test in Kentucky is rated High Satisfactory. Based on a fullscope review, the bank's performance in Johnson County is High Satisfactory.

## Lending Activity

Please refer to Table 1 Lending Volume in the state of Kentucky section of Appendix D for the facts and data used to evaluate the bank's lending activity.

Overall lending levels reflect good responsiveness to meeting AA credit needs. CNB ranked second among five financial institutions in deposits with a 23.95 percent market share as of June 30, 2012. CNB ranked fourth for home purchase loans, first for home improvement loans, and second for home mortgage refinance loans with respective market shares of 8.90 percent, 50.00 percent, and 15.68 percent. Residential lending market shares reflect strong competition with more than 50 residential lenders in the assessment area, most of which are not financial institutions. CNB ranked first in making small loans to businesses with a 22.83 percent market share. There are a large number of lenders making small loans to businesses in this AA.

## Distribution of Loans by Income Level of the Geography

An analysis of the distribution of loans by income level of the geography is not possible because there are no low- or moderate-income geographies in the AA.

## Home Mortgage Loans

Please refer to Tables 2, 3, 4, and 5 in the state of Kentucky section of Appendix D for the facts and data used to evaluate the geographic distribution of the bank's home mortgage loan originations/purchases.

## Small loans to businesses

Please refer to Table 6 in the state of Kentucky section of Appendix D for the facts and data used to evaluate the geographic distribution of the bank's origination/purchase of small loans to businesses.

## Lending Gap Analysis

A review and analysis of the geographic distribution of CNB's originations of home mortgage and small loans to businesses among AA geographies did not detect any conspicuous or unexplained gaps in CNB's lending patterns.

## Inside/Outside Ratio

The analysis of the bank's lending inside and outside the AAs includes originations and purchases only and was performed at the bank level as opposed to the AA level. We measured and analyzed residential real estate and business loans originated by CNB during the evaluation period. CNB's residential real estate loan originations included loans for purposes of home purchase, home improvement, and home refinance. CNB's residential real estate lending was analyzed using the HMDA data it originated, collected and reported over the period. CNB's business data was analyzed using the CRA data it originated, collected and reported over the period.

A high percentage of the bank's loan originations were in the combined AAs. Overall, 93\% of the total number and $90 \%$ of the total dollar amount of the bank's loan originations were within the AAs. By loan product, $94 \%$ of the total number and $91 \%$ of the total dollar amount of home mortgage loans and $92 \%$ of the total number and $92 \%$ of the total dollar amount of small loans to businesses were inside the bank's AAs.

## Distribution of Loans by Income Level of the Borrower

The borrower distribution of CNB's home mortgage loans and small loans to businesses reflects an overall good distribution among borrowers of different income levels and businesses of different sizes.

## Home Mortgage Loans

Please refer to Tables 8, 9 and 10 in the state of Kentucky section of Appendix D for the facts and data used to evaluate the borrower distribution of the bank's home mortgage loan originations and purchases. We considered the number of families that live below the poverty level and the barriers that this may have on home ownership in evaluating the borrower distribution of home mortgage loans. The 2000 U . S. Census reported that approximately 26 percent of the families in the AA live below the poverty level.

The overall borrower distribution of home mortgage loans in this AA is good.
The borrower distribution of home purchase loans is poor. The bank did not originate or purchase any home purchase loans to low- income borrowers. Consequently, the market share is not applicable. The percentage of loans to moderate-income borrowers is lower than the percentage of moderate-income families in the AA. The market share for moderate-income borrowers is lower than the overall market share.

The borrower distribution of home improvement loans is excellent. The percentage of loans to lowincome borrowers is lower than the percentage of low-income families in the AA. The market share for low-income borrowers exceeds the overall market share. The percentage of loans to moderate-income borrowers exceeds the percentage of moderate-income families in the AA. The market share for moderate-income borrowers exceeds the overall market share.

The borrower distribution of home mortgage refinance loans is good. The percentage of loans to lowincome borrowers is significantly lower than the percentage of low-income families in the AA. The market share for low-income borrowers exceeds the overall market share. The percentage of loans to moderate-income borrowers is lower than the percentage of moderate-income families in the AA. The market share for moderate-income borrowers exceeds the overall market share.

## Small Loans to Businesses

Please refer to Table 11 in the state of Kentucky section of Appendix D for the facts and data used to evaluate the borrower distribution of the bank's origination and purchase of small loans to businesses.

The borrower distribution of small loans to businesses is excellent. The percentage of small loans to businesses (businesses with annual revenues $\$ 1$ million or less) exceeds the percentage of small businesses in the AA. The market share of small loans to businesses exceeds the overall market share. A majority of small loans to businesses are for amounts of $\$ 100,000$ or less.

## Community Development Lending

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

Community development lending had a neutral impact on the overall performance under the lending test for the Johnson County KY non MSA AA. CNB originated one community development loan for \$579 thousand during the evaluation period.

## Product Innovation and Flexibility

CNB does not have any innovative or flexible loan products designed to meet the specific credit needs of low- and moderate-income individuals and small businesses. However, certain aspects of the bank's residential lending program benefit low-and moderate-income individuals. These include up to 98 percent financing for home purchase loans and a fixed closing cost guarantee. Additionally, CNB offers the Small Business Administration loan guarantee program.

## Conclusions for Areas Receiving Limited-Scope Reviews

Based on limited-scope reviews, the bank's performance under the lending test in Carter County is not inconsistent with the bank's overall performance in the state. Please refer to the Tables 1 through 13 in the state of Kentucky section of Appendix D for the facts and data that support these conclusions.

## INVESTMENT TEST

## Conclusions for Areas Receiving Full-Scope Reviews

The bank's performance under the investment test in Kentucky is rated Low Satisfactory. Based on a full-scope review, the bank's performance in Johnson County is adequate.

Please refer to Table 14 in the state of Kentucky section of Appendix D for the facts and data used to evaluate the bank's level of qualified investments.

CNB's level of community development investments was adequate. CNB had no qualified investment purchased during the evaluation period for the AA. CNB had $\$ 1.4$ million in carry forward investments. One of these investments is a municipal security for essential school and infrastructure improvements
and the second is a bond issue to fund utility system projects. Both of these are in middle-income geographies designated as distressed and/or underserved. CNB also had qualified donations totaling \$6,500 during the evaluation period.

CNB is always looking for new qualified investments that would benefit the communities it serves while accommodating the needs of the bank. During the review period, several investment opportunities have been presented to management for review and consideration; however, after careful consideration, it was determined that these investment opportunities did not fit the bank's investment strategy at that time.

## Conclusions for Area Receiving Limited-Scope Reviews

Based on limited-scope reviews, the bank's performance under the investment test in Carter County is weaker than the bank's overall performance in the state. CNB did not make any qualified investments in Carter County during the evaluation period. Performance in the limited-scope AA had a neutral impact on the bank's overall performance under the lending test for Kentucky due to the bank’s limited presence in this AA with one branch facility. Please refer to the Table 14 in the state of Kentucky section of Appendix D for the facts and data that support these conclusions.

## SERVICE TEST

## Conclusions for Areas Receiving Full-Scope Reviews

The bank’s performance under the service test in Kentucky is rated Low Satisfactory. Based on a fullscope review, the bank's performance in Johnson County is. adequate.

## Retail Banking Services

Please refer to Table 15 in the state of Kentucky section of Appendix D for the facts and data used to evaluate the distribution of the bank's branch delivery system and branch openings and closings.

An analysis of the bank's branch distribution by income level of the geography is not possible because there are no low- or moderate-income tracts in the AA. Johnson County has six middle income census tracts. The two branches in this AA are located in the City of Paintsville, the county seat and primary population center of this rural county. CNB closed no branches and opened none during the evaluation period.

Alternative delivery systems include Internet Banking and a telephone voice response system that allows customers to transfer funds, check balances, and conduct other transactions. We did not place significant weight on alternative delivery systems when drawing our performance conclusions due to the lack of data supporting the positive impact on low- and moderate-income individuals.

CNB offers a wide range of products and services at all of its branches in the AA. Branch hours are tailored to meet AA needs. Products, services, and business hours are reasonable and do not vary from one location to another.

## Community Development Services

CNB provided an adequate level of community development services. Identified community development services included three employees who provided financial literacy training at four public schools and the Mayo Branch sponsored a fund raising drive to purchase school supplies and back packs for a local school.

## Conclusions for Areas Receiving Limited-Scope Reviews

Based on limited-scope reviews, the bank's performance under the service test in Carter County is not inconsistent with the bank's overall Low Satisfactory performance under the service test in Kentucky. Please refer to Table 15 in the state of Kentucky section of Appendix D for the facts and data that support these conclusions.

## Appendix A: Scope of Examination

The following table identifies the time period covered in this evaluation, affiliate activities that were reviewed, and loan products considered. The table also reflects the metropolitan and nonmetropolitan areas that received comprehensive examination review (designated by the term "full-scope") and those that received a less comprehensive review (designated by the term "limited-scope").

| Time Period Reviewed | Lending Test, excluding CD loans: July 1, 2009 to December 31, 2011 <br> CD Loans and Investment: <br> November 3, 2009 to November 13, 2012 <br> Service Test: <br> November 3, 2009 to November 13, 2012 |  |
| :---: | :---: | :---: |
| Financial Institution |  | Products Reviewed |
| City National Bank of West Virginia (CNB) Cross Lanes, West Virginia |  | HMDA and small loans to businesses <br> Community development loans <br> Community development investments |
| Affiliate(s) | Affiliate Relationship | Products Reviewed |
| None | NA | NA |
| List of Assessment Areas and Type of Examination |  |  |
| Assessment Area | Type of Exam | Other Information |
| Huntington-Ashland, WV-KY-OH Multistate MSA 26580 | Full-scope |  |
| State of West Virginia: <br> Beckley Area Non-MSA | Full-scope | Contiguous counties within the aggregated AA: Braxton, Fayette, Greenbrier, Mercer, Nicholas, Pocahontas, Raleigh, and Summers |
| Charleston, WV MSA 16620 | Full-scope |  |
| Hagerstown-Martinsburg, MDWV Multistate MSA 25180 | Limited-scope | Berkeley and Morgan Counties, WV only |
| Harrison County | Limited-scope |  |
| Jackson and Mason Counties | Limited-scope |  |
| Washington-Arlington- <br> Alexandria Multistate MSA 47894 | Limited-scope | Jefferson County, WV only |
| State of Kentucky: Carter County | Limited-scope |  |
| Johnson County | Full-scope |  |

## Appendix B: Summary of Multistate Metropolitan Area and State Ratings

| RATINGS |  |  |  |  | CITY NATIONAL BANK OF WEST VIRGINIA |
| :--- | :---: | :---: | :---: | :---: | :---: |
| Overall Bank: | Lending Test <br> Rating* | Investment Test <br> Rating | Service Test <br> Rating | Overall Bank/State/ <br> Multistate Rating |  |
| City National Bank | High Satisfactory | High Satisfactory | Outstanding | Satisfactory |  |
| Multistate Metropolitan Area or State: |  |  |  |  |  |
| Huntington-Ashland- <br> Multistate MSA | Low Satisfactory | Low Satisfactory | High Satisfactory | Satisfactory |  |
| West Virginia | High Satisfactory | High Satisfactory | Outstanding | Satisfactory |  |
| Kentucky | High Satisfactory | Low Satisfactory | Low Satisfactory | Satisfactory |  |

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

## Appendix C: Market Profiles for Full-Scope Areas

## Huntington-Ashland, WV-KY-OH Multistate MSA

| Demographic Information for Full Scope Area: City NB Huntington-Ashland MSA AA |  |  |  |  |  |  |
| :---: | :---: | :---: | :---: | :---: | :---: | :---: |
| Demographic Characteristics | \# | Low <br> \% of \# | Moderate \% of \# | Middle \% of \# | Upper <br> \% of \# | $\begin{aligned} & \text { NA* } \\ & \% \text { of \# } \end{aligned}$ |
| Geographies (Census Tracts/BNAs) | 75 | 4.00 | 20.00 | 56.00 | 20.00 | 0.00 |
| Population by Geography | 288,649 | 1.88 | 14.15 | 61.87 | 22.09 | 0.00 |
| Owner-Occupied Housing by Geography | 85,045 | 0.12 | 11.80 | 64.92 | 23.16 | 0.00 |
| Business by Geography | 22,055 | 5.58 | 12.02 | 55.33 | 27.07 | 0.00 |
| Farms by Geography | 555 | 0.54 | 7.57 | 71.71 | 20.18 | 0.00 |
| Family Distribution by Income Level | 81,813 | 22.01 | 17.32 | 20.73 | 39.94 | 0.00 |
| Distribution of Low and Moderate Income Families throughout AA Geographies | 32,178 | 0.66 | 19.54 | 64.54 | 15.25 | 0.00 |
| Median Family Income HUD Adjusted Median Family Income for 2011 Households Below Poverty Level |  | $\begin{array}{r} 37,119 \\ 46,600 \\ 18 \% \end{array}$ | Median Housing Value Unemployment Rate (October 2012)** |  |  | $\begin{array}{\|l\|} \hline 66,759 \\ 6.60 \% \end{array}$ |

(*) The NA category consists of geographies that have not been assigned an income classification.
Source: 2000 U.S. Census, 2011 HUD updated MFI and U.S. Bureau of Labor Statistics.
This AA consists of five contiguous counties: Cabell and Wayne Counties in West Virginia; Boyd and Greenup Counties in Kentucky; and Lawrence County in Ohio. This AA contains the City of Huntington, the second largest city in West Virginia. Total population of this five-county area has declined slightly since the 2000 U.S. Census, with a 2011 estimated population of 287,599.

City National Bank (CNB) provides a full range of loan and deposit products to the AA throughout its thirteen full-service branches. Competition is particularly strong with 26 commercial banks operating 110 branches in the AA. In terms of deposits, CNB ranks fourth with 8.43 percent market share as of June 30, 2012. Primary competitors include Huntington Federal Savings Bank, Branch Banking \& Trust Co. (BB\&T), and First Sentry Bank, Inc. with a market share of 10.02 percent, 9.64 percent, and 8.89 percent, respectively.

While much of this AA is rural, the economy is fairly diverse with light manufacturing, retail trade, service businesses, government, and higher education. The largest employers in the AA are St. Mary's Hospital, Marshall University, Marathon Ashland Petroleum, and Cabell-Huntington Hospital. The unemployment rate for October 2012 for this AA, at 6.6, percent is slightly lower than the state unemployment rate of 7.5 percent and national unemployment rate of 7.9 percent. (Source: Bureau of Labor Statistics website.)

We identified community development needs and opportunities for participation by conducting community contact interviews. We relied on a community contact conducted by a Community Affairs Officer for the OCC with a Community Development Organization in the evaluation period. The contact revealed the need for funding to support the organization's owner/rehab program, which requires a 50 percent match in order to receive a grant from Kentucky’s Housing Corporation.

## State of West Virginia

Charleston MSA

| Demographic Information for Full Scope Area: City NB Charleston MSA AA |  |  |  |  |  |  |
| :---: | :---: | :---: | :---: | :---: | :---: | :---: |
| Demographic Characteristics | \# | Low <br> \% of \# | Moderate <br> \% of \# | Middle \% of \# | Upper <br> \% of \# | $\begin{aligned} & \text { NA* } \\ & \% \text { of \# } \end{aligned}$ |
| Geographies (Census Tracts/BNAs) | 76 | 2.63 | 26.32 | 51.32 | 19.74 | 0.00 |
| Population by Geography | 309,635 | 1.70 | 21.15 | 54.97 | 22.19 | 0.00 |
| Owner-Occupied Housing by Geography | 95,579 | 1.33 | 20.15 | 55.84 | 22.67 | 0.00 |
| Business by Geography | 25,315 | 10.00 | 16.39 | 46.35 | 27.26 | 0.00 |
| Farms by Geography | 375 | 3.20 | 13.87 | 56.53 | 26.40 | 0.00 |
| Family Distribution by Income Level | 88,430 | 21.80 | 17.65 | 20.13 | 40.41 | 0.00 |
| Distribution of Low and Moderate Income Families throughout AA Geographies | 34,889 | 2.77 | 29.79 | 55.63 | 11.81 | 0.00 |
| Median Family Income HUD Adjusted Median Family Income for 2011 Households Below Poverty Level |  | $\begin{aligned} & 40,961 \\ & 54,200 \\ & 16 \% \end{aligned}$ | Median Housing Value Unemployment Rate (October 2012) |  | $\begin{aligned} & \hline 78,052 \\ & 6.50 \% \% \end{aligned}$ |  |

(*) The NA category consists of geographies that have not been assigned an income classification. $_{\text {( }}$
Source: 2000 U.S. Census, 2011 HUD updated MFI and U.S. Bureau of Labor Statistics
This AA is comprised of five contiguous counties; Kanawha, Putnam, Lincoln, Clay, and Boone Counties, and includes the City of Charleston, which is the State Capital and the largest city in terms of population in West Virginia. Total population of this five-county area has declined since the 2000 U.S. Census, with a 2011 estimated population of 303,674 .

CNB provides a full range of loan and deposit products to the AA throughout its seventeen full-service branches. Competition is strong with 23 commercial banks operating 101 branches in the AA. In terms of deposits, CNB ranks third with $10.25 \%$ market share as of June 30, 2012. Primary competitors include Branch Banking \& Trust Company (BB\&T), ranked first with a 28.80 percent market share. Other significant competitors include United Bank ranked second with $12.61 \%$ market share and Huntington National Bank ranked fourth with a 10.07 percent market share.

Charleston is the business, financial, medical, government, retail and cultural center of the state. Charleston is the state's premier business center due to its industrial diversity and numerous job opportunities. There are nearly 6,000 businesses in Kanawha County. Economic growth in the Charleston MSA has been uneven. While Putnam County has experienced growth in population, Kanawha County has seen declines in population and meager job growth. The current unemployment rate for this AA at 6.5 percent is slightly lower than the state's 7.5 percent rate and the national unemployment rate of 7.9 percent. (Source: Bureau of Labor Statistics website.) This area relies heavily on government, retail trade, the service industry, health care, and education for employment. Major employers include Local and State Government, Charleston Area Medical Center, and the County Boards of Education.

We identify community development needs and opportunities for participation by conducting community contact interviews. We relied on a community contact conducted by a Community Affairs Officer for the OCC during the evaluation period. The non-profit economic development organization revealed financial institutions have an opportunity to help some key development groups to develop the
necessary capacity to provide critical services and hire people to provide the needed services to low-andmoderate income individuals.

## State of West Virginia

Beckley Area Non-MSA Counties

| Demographic Information for Full Scope Area: City NB - Beckley Area non-MSA AA |  |  |  |  |  |  |
| :--- | :--- | :--- | :--- | :--- | :--- | :--- |
| Demographic Characteristics | $\#$ | Low <br> \% of \# | Moderate <br> \% of \# | Middle <br> \% of \# | Upper <br> $\%$ of \# | NA* <br> $\%$ of \# |
| Geographies <br> Tracts/BNAs) | 67 | 0.00 | 7.46 | 80.60 | 11.94 | 0.00 |
| Population by Geography | 287,626 | 0.00 | 4.48 | 82.84 | 12.68 | 0.00 |
| Owner-Occupied Housing by <br> Geography | 91,323 | 0.00 | 4.25 | 82.95 | 12.80 | 0.00 |
| Business by Geography | 21,630 | 0.00 | 5.23 | 78.45 | 16.32 | 0.00 |
| Farms by Geography | 641 | 0.00 | 2.65 | 76.91 | 20.44 | 0.00 |
| Family Distribution by Income <br> Level | 81,829 | 20.99 | 17.77 | 21.11 | 40.14 | 0.00 |
| Distribution of Low and <br> Moderate Income Families <br> throughout AA Geographies | 31,713 | 0.00 | 5.91 | 84.38 | 9.70 | 0.00 |
| Median Family Income <br> HUD Adjusted Median Family Income for 2011 <br> Households Below Poverty Level | 32,500 <br> 44,800 <br> $20 \%$ | Median Housing Value <br> Unemployment <br> 2012 | Rate (October |  |  |  |

${ }^{(*)}$ The NA category consists of geographies that have not been assigned an income classification.
Source: 2000 U.S. Census, 2011 HUD updated MFI and U.S. Bureau of Labor Statistics
This AA now consists of eight contiguous counties in the non-metropolitan area near Beckley in the southeastern part of the state. The counties in this AA include Braxton, Fayette, Greenbrier, Mercer, Nicholas, Pocahontas, Raleigh, and Summers. This is a broad geographical area characterized by mountainous terrain that covers over 5,000 square miles. Total population of this eight-county area has remained static since the 2000 U.S. Census, with a 2008 estimated population of 287,599.

CNB provides a full range of loan and deposit products to the AA throughout its twenty-one full-service branches. Competition is strong with 22 commercial banks operating 110 branches in the AA. In terms of deposits, CNB ranks number one and has a 18.60 percent market share as of June 30, 2012. Primary competitors include Branch Banking \& Trust Company (BB\&T), ranked second with a 18.47 percent market share, First Community Bank, ranked third with a 13.45 percent market share, and United Bank, ranked fourth with a 8.96 percent market share.

Economic conditions in this rural AA have been mixed, with a decline in higher paying mining and related industries, but a growth in some service sectors. This area has come to rely more heavily on retail trade, service industries (including tourism), government, and education for employment. The current unemployment rate for this AA averaged 7.9 percent, which is higher than the West Virginia unemployment rate and matches the national unemployment percentage.

We identify community development needs and opportunities for participation by conducting community contact interviews. We relied on a community contact conducted by a Community Affairs Officer for the OCC performed in the evaluation period. The Community Service Organization revealed the need for utility bill assistance, senior nutrition programs, family day care programs, pre-natal care, and HUD programs to help build new houses.

## State of Kentucky

## Johnson County

| Demographic Information for Full Scope Area: City NB Johnson County non MSA |  |  |  |  |  |  |
| :---: | :---: | :---: | :---: | :---: | :---: | :---: |
| Demographic Characteristics | \# | Low <br> \% of \# | Moderate <br> \% of \# | Middle \% of \# | Upper <br> \% of \# | $\begin{aligned} & \text { NA* } \\ & \% \text { of \# } \end{aligned}$ |
| Geographies (Census Tracts/BNAs) | 6 | 0.00 | 0.00 | 100.00 | 0.00 | 0.00 |
| Population by Geography | 23,445 | 0.00 | 0.00 | 100.00 | 0.00 | 0.00 |
| Owner-Occupied Housing by Geography | 6,953 | 0.00 | 0.00 | 100.00 | 0.00 | 0.00 |
| Business by Geography | 2,052 | 0.00 | 0.00 | 100.00 | 0.00 | 0.00 |
| Farms by Geography | 25 | 0.00 | 0.00 | 100.00 | 0.00 | 0.00 |
| Family Distribution by Income Level | 6,877 | 27.63 | 17.75 | 19.12 | 35.50 | 0.00 |
| Distribution of Low and Moderate Income Families throughout AA Geographies | 3,121 | 0.00 | 0.00 | 100.00 | 0.00 | 0.00 |
| Median Family Income HUD Adjusted Median Family Income for 2011 Households Below Poverty Level |  | $\begin{aligned} & \hline 32,884 \\ & 43,000 \\ & 26 \% \end{aligned}$ | Median Housing Value Unemployment Rate (October 2012) |  | $\begin{aligned} & \hline 51,966 \\ & 9.00 \% \end{aligned}$ |  |

(*) The NA category consists of geographies that have not been assigned an income classification. $_{\text {( }}$
Source: 2000 U.S. Census and 2011 HUD updated MFI
Johnson County is located in eastern Kentucky near the West Virginia state line. Total population has remained static as that reported in the 2000 U.S. Census, with a 2011 estimated population of 23,396. (Source: U.S. Census Bureau)

CNB provides a full range of loan and deposit products to the AA through its two full-service branches. There are five commercial banks operating 8 branches in the AA. In terms of deposits, CNB ranks second with 23.95 percent market share as of June 30, 2012. Primary competitors include Citizens NB of Paintsville ranked first with a 49.06 percent market share and The First Commonwealth Bank of Prestonsburg, Inc. ranked third with 12.14 percent market share.

This is a largely rural county located in the "eastern coal field" region of the state. Historical reliance on higher paying jobs in the coal mining industry has been replaced, to a large degree, by greater reliance on generally lower paying jobs in the retail, service, and government employment sectors. The current unemployment rate for this AA at $9 \%$ is somewhat higher than the state's $8.4 \%$ rate and the national unemployment rate of $7.9 \%$. (Source: Bureau of Labor Statistics website.)

We identify community development needs and opportunities for participation by conducting community contact interviews. We relied on a community contact conducted by a Community Affairs Officer for the OCC during the evaluation period. The Community Service Organization revealed the need to provide funding to low- and moderate-income small business entrepreneurs to hire, produce, and build local economies. These projects encourage people to live and work in distressed communities resulting in revitalization.

## Appendix D: Tables of Performance Data

## Content of Standardized Tables

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

The following is a listing and brief description of the tables included in each set:
Table 1. Lending Volume - Presents the number and dollar amount of reportable loans originated and purchased by the bank over the evaluation period by MA/assessment area. Community development loans to statewide or regional entities or made outside the bank's assessment area may receive positive CRA consideration. See Interagency Q\&As __. 12 (i) - 5 and - 6 for guidance on when a bank may receive positive CRA consideration for such loans. Refer to the CRA section of the Compliance Policy intranet page for guidance on table placement.

Table 1. Other Products - Presents the number and dollar amount of any unreported category of loans originated and purchased by the bank, if applicable, over the evaluation period by MA/assessment area. Examples include consumer loans or other data that a bank may provide, at its option, concerning its lending performance. This is a two-page table that lists specific categories.

Table 2. Geographic Distribution of Home Purchase Loans - Compares the percentage distribution of the number of loans originated and purchased by the bank in low-, moderate-, middle-, and upper-income geographies to the percentage distribution of owner-occupied housing units throughout those geographies. The table also presents market share information based on the most recent aggregate market data available.

## Table 3. Geographic Distribution of Home Improvement Loans - See Table 2.

Table 4. Geographic Distribution of Home Mortgage Refinance Loans - See Table 2.
Table 5. Geographic Distribution of Multifamily Loans - Compares the percentage distribution of the number of multifamily loans originated and purchased by the bank in low-, moderate-, middle-, and upper-income geographies to the percentage distribution of multifamily housing units throughout those geographies. The table also presents market share information based on the most recent aggregate market data available.

Table 6. Geographic Distribution of Small Loans to Businesses - The percentage distribution of the number of small loans (less than or equal to $\$ 1$ million) to businesses originated and purchased by the bank in low-, moderate-, middle-, and upperincome geographies compared to the percentage distribution of businesses (regardless of revenue size) throughout those geographies. The table also presents market share information based on the most recent aggregate market data available. Because small business data are not available for geographic areas smaller than counties, it may be necessary to use geographic areas larger than the bank's assessment area.

Table 7. Geographic Distribution of Small Loans to Farms - The percentage distribution of the number of small loans (less than or equal to $\$ 500,000$ ) to farms originated and purchased by the bank in low-, moderate-, middle-, and upper-income geographies compared to the percentage distribution of farms (regardless of revenue size) throughout those geographies. The table also presents market share information based on the most recent aggregate market data available. Because small farm data are not available for geographic areas smaller than counties, it may be necessary to use geographic areas larger than the bank's assessment area.

Table 8. Borrower Distribution of Home Purchase Loans - Compares the percentage distribution of the number of loans originated and purchased by the bank to low-, moderate-, middle-, and upper-income borrowers to the percentage distribution of families by income level in each MA/assessment area. The table also presents market share information based on the most recent aggregate market data available.

Table 9. Borrower Distribution of Home Improvement Loans - See Table 8.
Table 10. Borrower Distribution of Refinance Loans - See Table 8.

Table 11. Borrower Distribution of Small Loans to Businesses - Compares the percentage distribution of the number of small loans (less than or equal to $\$ 1$ million) originated and purchased by the bank to businesses with revenues of $\$ 1$ million or less to the percentage distribution of businesses with revenues of $\$ 1$ million or less. In addition, the table presents the percentage distribution of the number of loans originated and purchased by the bank by loan size, regardless of the revenue size of the business. Market share information is presented based on the most recent aggregate market data available.

Table 12. Borrower Distribution of Small Loans to Farms - Compares the percentage distribution of the number of small loans (less than or equal to $\$ 500,000$ ) originated and purchased by the bank to farms with revenues of $\$ 1$ million or less to the percentage distribution of farms with revenues of $\$ 1$ million or less. In addition, the table presents the percentage distribution of the number of loans originated and purchased by the bank by loan size, regardless of the revenue size of the farm. Market share information is presented based on the most recent aggregate market data available.

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

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

A bank may receive positive consideration for qualified investments in statewide/regional entities or made outside of the bank's assessment area. See Interagency Q\&As _ . 12 (i) - 5 and - 6 for guidance on when a bank may receive positive CRA consideration for such investments.

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

## Tables of Performance Data

## Huntington-Ashland, WV-KY-OH Multi-state MSA

Institution ID: CITY NATIONAL BANK OF WV (10000014807) (Included)


[^2]Institution ID: CITY NATIONAL BANK OF WV (10000014807) (Included)
Table 1. Other Products

| LENDING VOLUME 2011 |  | Geography: HUNTINGTONASHLAND MSA |  |  |  |  |  | Evaluation Period: JULY 1, 2009 TO DECEMBER 31, |  |  |  |  |  |  |
| :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: |
| Assessment Area : | \% of <br> Rated <br> Area <br> Loans <br> (\#) in <br> MA/AA* | Total Optional Loans** |  | Small Business Real Estate Secured** |  | Home Equity** |  | Motor Vehicle** |  | Credit Card** |  | Other Secured Consumer** |  | \% of <br> Rated <br> Area Deposits in $A A^{* * *}$ |
|  |  | \# | $\begin{gathered} \hline \$ \\ (000 \text { 's) } \end{gathered}$ | \# | $\begin{gathered} \hline \$ \\ (000 \text { 's) } \end{gathered}$ | \# | $\begin{gathered} \hline \$ \\ (000 \text { 's }) \end{gathered}$ | \# | $\begin{gathered} \hline \$ \\ (000 \text { 's) } \end{gathered}$ | \# | $\begin{gathered} \hline \$ \\ (000 ' \mathrm{~s}) \end{gathered}$ | \# | \$(000's) |  |
| Full Review: |  |  |  |  |  |  |  |  |  |  |  |  |  |  |
| 26580 HuntingtonAshland WV KY OH Multi state MSA | 0.00 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 100.00 |

[^3]Institution ID: CITY NATIONAL BANK OF WV (10000014807) (Included)
Table 1. Other Products

| LENDING VOLUME 2011 | Geography: HUNTINGTON ASHLAND MSA |  |  |  | Evaluation Period: JULY 1, 2009 TO DECEMBER 31, |  |  |  |
| :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: |
| Assessment Area : | Other Unsecured Consumer Loans* |  |  |  |  | Other Optional Loans* |  |  |
|  | \# |  | \$ (000's) |  | \# |  | \$ (000's) |  |
| Full Review: |  |  |  |  |  |  |  |  |
| 26580 HuntingtonAshland WV KY OH Multi state MSA |  | 0 |  | 0 |  | 0 |  | 0 |

[^4]Institution ID: CITY NATIONAL BANK OF WV (10000014807) (Included)

Table 2. Geographic Distribution of Home Purchase Loans

| Geographic Distribution $2011$ | HOME | URCHA |  | eography | HUNTIN | TON AS | AND MSA |  | aluation | eriod: J | Y 1, 20 | 9 TO | ECEM | ER |  |
| :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: |
| Assessment Area: | Total Home Purchase Loans |  | Low-Income Geographies |  | Moderate-Income Geographies |  | Middle-Income Geographies |  | Upper-Income Geographies |  | Market Share (\%) by Geography* |  |  |  |  |
|  | \# | $\begin{gathered} \hline \% \\ \text { of } \\ \text { Total } \end{gathered}$ | \% Owner Occ Units *** | \% BANK Loans **** | \% <br> Owner Occ Units |  | \% Owner Occ Units |  | \% Owner Occ Units *** | \% BANK <br> Loans | Overall | Low | Mod | Mid | Upp |
| Full Review: |  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |
| 26580 HuntingtonAshland WV KY OH Multi state MSA | 470 | 100.00 | 0.12 | 0.00 | 11.80 | 6.17 | 64.92 | 61.91 | 23.16 | 31.91 | 9.27 | 0.00 | 4.79 | 9.69 | 9.47 |

[^5]Institution ID: CITY NATIONAL BANK OF WV (10000014807) (Included)
Table 3. Geographic Distribution of Home Improvement Loans

| Geographic Distribut 2011 | $\mathrm{HO}$ | IMPR | EMEN | Geo | hy: H | NGT | SHL | MSA | Eval | Per | JUL | 200 | DE | MBE |  |
| :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: |
| Assessment Area: | Total Home Improvement Loans |  | Low-Income Geographies |  | Moderate-Income Geographies |  | Middle-Income Geographies |  | Upper-Income Geographies |  | Market Share (\%) by Geography* |  |  |  |  |
|  | \# | $\begin{gathered} \hline \% \\ \text { of } \\ \text { Total } \end{gathered}$ | \% Owner Occ Units *** | \% BANK Loans **** | \% Owner Occ Units *** | $\begin{gathered} \hline \% \\ \text { BANK } \\ \text { Loans } \end{gathered}$ | \% Owner Occ Units *** | \% BANK Loans | \% <br> Owner Occ Units *** | \% BANK Loans | Overall | Low | Mod | Mid | Upp |
| Full Review: |  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |
| 26580 HuntingtonAshland WV KY OH Multi state MSA | 483 | 100.00 | 0.12 | 0.00 | 11.80 | 7.45 | 64.92 | 68.74 | 23.16 | 23.81 | 29.34 | 0.00 | 22.45 | 30.12 | 29.41 |

[^6]Institution ID: CITY NATIONAL BANK OF WV (10000014807) (Included)
Table 4. Geographic Distribution of Home Mortgage Refinance Loans

| Geographic Distributio DECEMBER 31, 201 | HON | E MORT | GE R | NANCE | Geography: HUNTINGTON ASHLAND MSA |  |  |  |  | Evaluation Period: JULY 1, 2009 TO |  |  |  |  |  |
| :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: |
| Assessment Area: | Total Home Mortgage Refinance Loans |  | Low-Income Geographies |  | Moderate-Income Geographies |  | Middle-Income Geographies |  | Upper-Income Geographies |  | Market Share (\%) by Geography* |  |  |  |  |
|  | \# | $\begin{gathered} \text { \% } \\ \text { of } \\ \text { Total } \end{gathered}$ | \% Owner Occ Units *** | $\begin{gathered} \hline \% \\ \text { BANK } \\ \text { Loans } \end{gathered}$ |  | $\begin{gathered} \hline \% \\ \text { BANK } \end{gathered}$ Loans | \% Owner Occ Units *** | \% BANK Loans | \% Owner Occ Units *** | BANK <br> Loans | Overall | Low | Mod | Mid | Upp |
| Full Review: |  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |
| 26580 HuntingtonAshland WV KY OH Multi state MSA | 684 | 100.00 | 0.12 | 0.00 | 11.80 | 6.14 | 64.92 | 67.25 | 23.16 | 26.61 | 8.13 | 0.00 | 10.58 | 8.79 | 6.38 |

[^7]
## Institution ID: CITY NATIONAL BANK OF WV (10000014807) (Included)

Table 5. Geographic Distribution of Multifamily Loans


[^8]Institution ID: CITY NATIONAL BANK OF WV (10000014807) (Included)
Table 6. Geographic Distribution of Small Loans to Businesses

| Geographic Distribution: SMALL LOANS TO BUSINESSES <br> Geography: HUNTINGTON ASHLAND MSA TO DECEMBER 31, 2011 |  |  |  |  |  |  |  |  |  |  | Evaluation Period: JULY 1, 2009 |  |  |  |  |
| :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: |
|  | Total Small Business Loans |  | Low-Income Geographies |  | Moderate-Income Geographies |  | Middle-Income Geographies |  | Upper-Income Geographies |  | Market Share (\%) by Geography* |  |  |  |  |
| Assessmen t Area: | \# | $\begin{gathered} \hline \text { \% of } \\ \text { Total** } \end{gathered}$ | \% of Businesses *** | $\begin{gathered} \hline \% \\ \text { BAN } \\ \text { K } \\ \text { Loan } \\ \mathrm{s} \\ \hline \end{gathered}$ | $\%$ of $\substack{\text { Businesses } \\ * * *}$ |  | $\%$ of $\substack{\text { Businesses } \\ * * *}$ | \% BANK Loans | \% of $\substack{\text { Businesses } \\ * * *}$ | \% $\%$ <br> Loans | Overall | Low | Mod | Mid | Up p |
| Full Review: |  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |
| 26580 <br> Huntington- <br> Ashland <br> WV KY OH <br> Multi state <br> MSA | 245 | 100.00 | 5.58 | 4.08 | 12.02 | 15.10 | 55.33 | 56.73 | 27.07 | 24.08 | 4.43 | 3.57 | 5.90 | 4.94 | 3.97 |

[^9]Institution ID: CITY NATIONAL BANK OF WV (10000014807) (Included)
Table 7. Geographic Distribution of Small Loans to Farms

| Geographic Distribution DECEMBER 31, 201 | SMA | L L | NS TO | ARMS |  | ograph | HUN | VGTON | HLAN | MSA |  | Evalu | tion P | iod: J | Y 1, | 009 TO |
| :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: |
| Assessment Area: | Total Small Farm Loans |  |  | Low-Income Geographies |  | ModerateIncome Geographies |  | Middle-Income Geographies |  | Upper-Income Geographies |  | Market Share (\%) by Geography* |  |  |  |  |
|  | \# |  | $\begin{gathered} \hline \% \\ \text { of } \\ \text { Total } \\ \text { ** } \end{gathered}$ | $\begin{gathered} \hline \% \\ \text { of } \\ \text { Farms } \end{gathered}$ | $\qquad$ BANK Loans | $\begin{gathered} \hline \% \\ \text { of } \\ \text { Farms } \\ * * * \end{gathered}$ |  | \% of Farms *** |  | $\begin{gathered} \hline \% \\ \text { of } \\ \text { Farms } \\ * * * \end{gathered}$ | $\begin{array}{\|c} \hline \% \\ \text { BANK } \\ \text { Loans } \end{array}$ | Overall | Low | Mod | Mid | Upp |
| Full Review: |  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |
| 26580 HuntingtonAshland WV KY OH Multi state MSA |  | 4 | 100.00 | 0.54 | 0.00 | 7.57 | 0.00 | 71.71 | 50.00 | 20.18 | 50.00 | 25.00 | 0.00 | 0.00 | 20.00 | 100.00 |

[^10]Institution ID: CITY NATIONAL BANK OF WV (10000014807) (Included)
Table 8. Borrower Distribution of Home Purchase Loans

| Borrower Distribution: HOME PURCHASE DECEMBER 312011 |  |  |  |  | Geography: HUNTINGTON ASHLAND MSA |  |  |  |  |  | Evaluation Period: JULY 1, 2009 TO |  |  |  |  |
| :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: |
| Assessment Area: | Total Home Purchase Loans |  | Low-Income Borrowers |  | Moderate-Income Borrowers |  | Middle-Income Borrowers |  | Upper-Income Borrowers |  | Market Share* |  |  |  |  |
|  | \# | \% of Total ** | $\begin{array}{c\|} \hline \% \\ \text { Families } \\ \star * * \end{array}$ | \% <br> BANK <br> Loans | \% <br> Families ${ }^{4}$ | \% <br> BANK <br> Loans | $\begin{array}{c\|} \hline \% \\ \text { Families } \\ * * * \end{array}$ | $\%$ BANK Loans $* * *$ | $\begin{gathered} \% \\ \text { Families } \end{gathered}$ | $\%$ BANK Loans $* * * *$ | Overall | Low | Mod | Mid | Upp |
| Full Review: |  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |
| 26580 <br> Huntington- <br> Ashland WV <br> KY OH Multi <br> state MSA | 470 | 100.00 | 22.01 | 1.30 | 17.32 | 15.00 | 20.73 | 22.17 | 39.94 | 61.52 | 9.91 | 1.43 | 6.76 | 6.35 | 15.04 |

[^11]Institution ID: CITY NATIONAL BANK OF WV (10000014807) (Included)
Table 9. Borrower Distribution of Home Improvement Loans

| Borrower Distribution: HOME IMPROVEMENT TO DECEMBER 31, 2011 |  |  |  |  |  | Geography: HUNTINGTON ASHLAND MSA |  |  |  |  | Evaluation Period: JULY 1, 2009 |  |  |  |  |
| :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: |
|  | Total Home Improvement Loans |  | Low-Income Borrowers |  | Moderate-Income Borrowers |  | Middle-Income Borrowers |  | Upper-Income Borrowers |  | Market Share* |  |  |  |  |
| Area: | \# | $\begin{gathered} \hline \% \\ \text { of } \\ \text { Total } \\ * * \end{gathered}$ | $\begin{gathered} \hline \% \\ \text { Families } \\ * * * \end{gathered}$ | \% <br> BANK <br> Loans <br> $* * * *$ | \% Families ${ }^{5}$ | \% <br> BANK <br> Loans <br> **** | $\begin{gathered} \hline \% \\ \underset{\substack{\% \\ \text { Families }}}{ } \end{gathered}$ | $\begin{gathered} \hline \% \\ \text { BANK } \\ \text { Loans } \\ * * * * \end{gathered}$ | $\underset{* * *}{\%} \begin{gathered} \% \\ \text { Families } \end{gathered}$ | $\begin{gathered} \hline \% \\ \text { BANK } \\ \text { Loans } \\ * * * * \end{gathered}$ | Overall | Low | Mod | Mid | Upp |
| Full Review: |  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |
| 26580 <br> Huntington- <br> Ashland WV KY <br> OH Multi state MSA | 483 | 100.00 | 22.01 | 8.44 | 17.32 | 18.35 | 20.73 | 20.04 | 39.94 | 53.16 | 29.80 | 28.17 | 24.35 | 23.08 | 35.79 |

[^12]Institution ID: CITY NATIONAL BANK OF WV (10000014807) (Included)
Table 10. Borrower Distribution of Home Mortgage Refinance Loans

| Borrower Distribution: HOME MORTGAGE REFINANCE Geography: HUNTINGTON ASHLAND MSATO DECEMBER 31, 2011 |  |  |  |  |  |  |  |  |  |  |  | Evaluation Period: JULY 1, 2009 |  |  |  |
| :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: |
| Assessment | Total Home Mortgage Refinance Loans |  | Low-Income Borrowers |  | Moderate-Income Borrowers |  | Middle-Income Borrowers |  | Upper-Income Borrowers |  | Market Share* |  |  |  |  |
| Area: | \# | $\begin{gathered} \hline \% \\ \text { of } \\ \text { Total } \end{gathered}$ | $\underset{\text { F** }}{\substack{\% \\ \text { Families }}}$ | \% BANK Loans **** | $\begin{gathered} \% \\ \text { Families }^{6} \end{gathered}$ | \% <br> BANK <br> Loans <br> **** | $\begin{array}{c\|} \hline \% \\ \text { Families } \\ \star * * \end{array}$ | \% <br> BANK <br> Loans <br> **** | $\begin{gathered} \hline \% \\ \text { Families } \\ * * * \end{gathered}$ | \% BANK Loans **** | Overall | Low | Mod | Mid | Upp |
| Full Review: |  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |
| 26580 <br> Huntington- <br> Ashland <br> WV KY OH <br> Multi state MSA | 684 | 100.00 | 22.01 | 5.84 | 17.32 | 14.52 | 20.73 | 24.25 | 39.94 | 55.39 | 8.80 | 12.06 | 8.88 | 9.26 | 8.23 |

[^13]
## Institution ID：CITY NATIONAL BANK OF WV（10000014807）（Included）

Table 11．Borrower Distribution of Small Loans to Businesses

| Borrower Distribution：SMALL LOANS TO BUSINESSES Geography：HUNTINGTON ASHLAND MSA Evaluation Period：JULY 1， 2009TO DECEMBER 31， 2011 |  |  |  |  |  |  |  |  |  |
| :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: |
| Assessment Area： | Total Small Loans to Businesses |  | Businesses With Revenues of \＄1 million or less |  | Loans by Original Amount Regardless of Business Size |  |  | Market Share＊ |  |
|  | \＃ | $\begin{gathered} \hline \text { \% } \\ \text { of } \\ \text { Total } \end{gathered}$ | \％ of Businesses $* * *$ |  | $\begin{gathered} \$ 100,000 \text { or } \\ \text { less } \end{gathered}$ | $\begin{gathered} >\$ 100,000 \text { to } \\ \$ 250,000 \end{gathered}$ | $\begin{aligned} & >\$ 250,000 \text { to } \\ & \$ 1,000,000 \end{aligned}$ | All | Rev\＄ 1 Million or Less |
| Full Review： |  |  |  |  |  |  |  |  |  |
| 26580 Huntington－ Ashland WV KY OH Multi state MSA | 245 | 100.00 | 63.67 | 69.39 | 57.14 | 23.27 | 19.59 | 4.43 | 6.72 |

[^14]Institution ID: CITY NATIONAL BANK OF WV (10000014807) (Included)
Table 12. Borrower Distribution of Small Loans to Farms

| Borrower Distribution: SMALL LOANS TO FARMS <br> TO DECEMBER 31, 2011 |  |  |  | Geography: HUNTINGTON ASHLAND MSA Eval |  |  |  | Evaluation Period: JULY 1, 2009 |  |
| :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: |
| Assessment Area: | Total Small Loans to Farms |  | Farms With Revenues of \$1 million or less |  | Loans by Original Amount Regardless of Farm Size |  |  | Market Share* |  |
|  | \# | $\begin{gathered} \hline \text { \% } \\ \text { of Total } \\ * * \end{gathered}$ | $\stackrel{\%}{\text { of }} \underset{* * *}{\text { Farms }}$ |  | \$100,000 or less | $\begin{gathered} >\$ 100,000 \\ \text { to } \$ 250,000 \end{gathered}$ | $\begin{gathered} >\$ 250,000 \text { to } \\ \$ 500,000 \end{gathered}$ | All | Rev\$ 1 Million or Less |
| Full Review: |  |  |  |  |  |  |  |  |  |
| 26580 Huntington- <br> Ashland WV KY OH <br> Multi state MSA | 4 | 100.00 | 98.20 | 100.00 | 100.00 | 0.00 | 0.00 | 25.00 | 100.00 |

[^15]Institution ID: CITY NATIONAL BANK OF WV (10000014807) (Included)
Table 14. Qualified Investments

| QUALIFIED INVESTMENTS 2011 |  | Geography: HUNTINGTON ASHLAND MSA |  |  | Evaluation Period: JULY 1, 2009 TO DECEMBER 31, |  |  |  |  |
| :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: |
| Assessment Area: | Prior Period Investments* |  | Current Period Investments |  | Total Investments |  |  | Unfunded Commitments** |  |
|  | \# | \$(000's) | \# | \$(000's) | \# | \$(000's) | \% of Total | \# | \$(000's) |
| Full Review: |  |  |  |  |  |  |  |  |  |
| 26580 Huntington- <br> Ashland WV KY OH <br> Multi state MSA | 0 | 0 | 0 | 0 | 0 | 0 | 0.00 | 0 | 0 |
| Statewide/Regional | 1 | 947 | 1 | 233 | 2 | 1,180 | 100.00 | 0 | 0 |

[^16]Institution ID: CITY NATIONAL BANK OF WV (10000014807) (Included)
Table 15. Distribution of Branch Delivery System and Branch Openings/Closings

| DISTRIBUTION OF BRANCH DELIVERY SYSTEM AND BRANCH OPENINGS/CLOSINGSEvaluation Period: JULY 1, 2009 TO DECEMBER 31, 2011 |  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |
| :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: |
| MA/Assessment Area: | Deposits <br> $\%$ <br> of Rated <br> Area <br> Deposits <br> in AA | Branches |  |  |  |  |  | Branch Openings/Closings |  |  |  |  |  | Population |  |  |  |
|  |  | \# of BANK Branches | \% <br> of Rated Area Branches in AA | Location of Branches by Income of Geographies (\%) |  |  |  | $\#$ofBranchOpenings | $\#$ofIBranchClosings | Net change in Location of Branches (+ or - ) |  |  |  | \% of Population within Each Geography |  |  |  |
|  |  |  |  | Low | Mod | Mid | Upp |  |  | Low | Mod | Mid | Upp | Low | Mod | Mid | Upp |
| Full Review: |  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |
| 26580 <br> HuntingtonAshland WV KY <br> OH Multi state MSA | 100.00 | 13 | 100.00 | 23 | 8 | 46 | 23 | 0 | 1 | 0 | 0 | 0 | -1 | 1.88 | 14.15 | 61.87 | 22.09 |

Institution ID: CITY NATIONAL BANK OF WV (10000014807) (Included)
Distribution of Branch and ATM Delivery System

| Distribution of Branch and ATM Delivery System TO DECEMBER 31, 2011 |  |  |  |  | Geography: HUNTINGTON ASHLAND MSA |  |  |  |  |  |  |  | Evaluation Period: JULY 1, 2009 |  |  |  |  |
| :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: |
| MA/Assessment Area: | Deposits <br> $\%$ <br> of Total <br> Bank <br> Deposits | Branches |  |  |  |  |  | ATMs |  |  |  |  |  | Population |  |  |  |
|  |  | \# of Bank Branches | \% of Total Bank Branches | Location of Branches by Income of Geographies (\%) |  |  |  | \#ofBankATMs | \%ofTotalBankATMs | Location of ATMs by Income of Geographies |  |  |  | \% of Population within Each Geography |  |  |  |
|  |  |  |  | Low | Mod | Mid | Upp |  |  | Low | Mod | Mid | Upp | Low | Mod | Mid | Upp |
| Full Review: |  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |
| 26580 HuntingtonAshland WV KY OH Multi state MSA | 100.00 | 13 | 100.00 | 23 | 8 | 46 | 23 | 13 | 100.00 | 3 | 1 | 6 | 3 | 1.88 | 14.15 | 61.87 | 22.09 |

## State of West Virginia

> Institution ID: CITY NATIONAL BANK OF WV (10000014807) (Included)

## Table 1. Lending Volume



[^17]Institution ID: CITY NATIONAL BANK OF WV (10000014807) (Included)

Table 1. Other Products

| LENDING VOLUME |  | Geography: STATE OF WEST VIRGINIA |  |  |  |  |  | Evaluation Period: JULY 1, 2009 TO DECEMBER 31, |  |  |  |  |  |  |
| :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: |
| Assessment Area: | \% of <br> Rated <br> Area Loans (\#) in MA/AA* | Total Optional Loans ** |  | Small Business Real Estate Secured ** |  | Home Equity ** |  | Motor Vehicle |  | $\underset{* *}{\text { Credit Card }}$ |  | Other Secured Consumer ** |  | \% of Rated Area Deposits in $A A$ *** |
|  |  | \# | $\begin{gathered} \hline \$ \\ (000 \text { 's) } \end{gathered}$ | \# | $\begin{gathered} \hline \$ \\ (000 \text { 's }) \end{gathered}$ | \# | $\begin{gathered} \hline \$ \\ (000 \text { 's) } \end{gathered}$ | \# | $\begin{gathered} \hline \$ \\ (000 \text { 's) } \end{gathered}$ | \# | $\begin{gathered} \hline \$ \\ (000 \text { 's }) \end{gathered}$ | \# | \$(000's) |  |
| Full Review: |  |  |  |  |  |  |  |  |  |  |  |  |  |  |
| 16620 Charleston WV MSA | 0.00 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 34.78 |
| Beckley area non MSA | 0.00 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 44.02 |
| Limited Review: |  |  |  |  |  |  |  |  |  |  |  |  |  |  |
| 25180 Hagerstown-Martinsburg MD WV MSA (Jefferson County WV) | 0.00 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 8.13 |
| 47894 Washington-ArlingtonAlexandria DC-MD-VA-WV MD (Berkeley \& Morgan County WV) | 0.00 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 1.96 |
| Harrison Co WV non-MSA | 0.00 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 8.75 |
| Jackson \& Mason Co WV non-MSA | 0.00 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 2.35 |

[^18]Institution ID: CITY NATIONAL BANK OF WV (10000014807) (Included)

Table 1. Other Products

| LENDING VOLUME TO DECEMBER 31, 2011 | Geography: STATE OF WEST VIRGINIA |  | Evaluation Period: JULY 1, 2009 |  |
| :---: | :---: | :---: | :---: | :---: |
| MA/Assessment Area: | Other Unsecured Consumer Loans* |  | Other Optional Loans* |  |
|  | \# | \$ (000's) | \# | \$ (000's) |
| Full Review: |  |  |  |  |
| 16620 Charleston WV MSA | 0 | 0 | 0 | 0 |
| Beckley area non MSA | 0 | 0 | 0 | 0 |
| Limited Review: |  |  |  |  |
| 25180 Hagerstown-Martinsburg MDWV MSA (Berkeley \& Morgan Co. WV) | 0 | 0 | 0 | 0 |
| 47894 Washington-ArlingtonAlexandria DC-MD-VA-WV MD (Jefferson Co WV) | 0 | 0 | 0 | 0 |
| Harrison Co WV non-MSA | 0 | 0 | 0 | 0 |
| Jackson \& Mason Co WV non-MSA | 0 | 0 | 0 | 0 |

[^19]Institution ID: CITY NATIONAL BANK OF WV (10000014807) (Included)
Table 2. Geographic Distribution of Home Purchase Loans

| Geographic Distribution: HOME PURCHASE TO DECEMBER 31, 2011 |  |  |  |  | Geography: STATE OF WEST VIRGINIA |  |  |  |  |  | Evaluation Period: JULY 1, 2009 |  |  |  |  |
| :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: |
| Assessment Area: | Total Home Purchase Loans |  | Low-Income Geographies |  | ModerateIncome Geographies |  | Middle-Income Geographies |  | Upper-Income Geographies |  | Market Share (\%) by Geography* |  |  |  |  |
|  | \# | $\begin{gathered} \hline \% \\ \text { of } \\ \text { Total } \end{gathered}$ | \% Owner Occ Units*** | \% <br> BANK <br> Loans <br> **** | \% <br> Owner Occ Units *** | \% BANK Loans | \% Owner Occ Units *** |  | \% Owner Occ Units *** |  | Overall | Low | Mod | Mid | Upp |
| Full Review: |  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |
| 16620 Charleston WV MSA | 512 | 43.39 | 1.33 | 0.59 | 20.15 | 7.42 | 55.84 | 50.98 | 22.67 | 41.02 | 8.65 | 15.79 | 5.61 | 8.31 | 9.87 |
| Beckley area non MSA | 405 | 34.32 | 0.00 | 0.00 | 4.25 | 2.96 | 82.95 | 70.86 | 12.80 | 26.17 | 9.39 | 0.00 | 12.12 | 7.87 | 15.19 |
| Limited Review: |  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |
| 25180 HagerstownMartinsburg MD-WV MD (Berkeley \& Morgan Co. WV) | 124 | 10.51 | 0.00 | 0.00 | 16.67 | 14.52 | 83.33 | 85.48 | 0.00 | 0.00 | 2.00 | 0.00 | 1.67 | 2.03 | 0.00 |
| 47894 Washington-Arlington-Alexandria DC-MD-VA-WV MD (Jefferson Co. WV) | 48 | 4.07 | 0.00 | 0.00 | 71.13 | 68.75 | 28.87 | 31.25 | 0.00 | 0.00 | 2.05 | 0.00 | 1.25 | 4.90 | 0.00 |
| Harrison Co WV nonMSA | 18 | 1.53 | 0.00 | 0.00 | 2.77 | 0.00 | 65.65 | 50.00 | 31.58 | 50.00 | 1.75 | 0.00 | 0.00 | 1.36 | 2.13 |
| Jackson \& Mason Co WV non-MSA | 73 | 6.19 | 0.00 | 0.00 | 0.00 | 0.00 | 88.01 | 79.45 | 11.99 | 20.55 | 11.51 | 0.00 | 0.00 | 11.20 | 13.33 |

[^20]Institution ID: CITY NATIONAL BANK OF WV (10000014807) (Included)
Table 3. Geographic Distribution of Home Improvement Loans

| Geographic Distribution: HOME IMPROVEMENT TO DECEMBER 31, 2011 |  |  |  |  | Geography: STATE OF WEST VIRGINIA |  |  |  |  |  | Evaluation Period: JULY 1, 2009 |  |  |  |  |
| :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: |
| Assessment Area: | Total Home Improvement Loans |  | Low-Income Geographies |  | ModerateIncome Geographies |  | Middle-Income Geographies |  | Upper-Income Geographies |  | Market Share (\%) by Geography* |  |  |  |  |
|  | \# | $\begin{gathered} \hline \% \\ \text { of } \\ \text { Total } \end{gathered}$ | \% Owner Occ Units *** | \% BANK Loans **** | \% Owner Occ Units *** | \% <br> Loans | \% Owner Occ Units *** | $\%$ BANK Loans | \% Owner Occ Units *** | \% BANK Loans | Overall | Low | Mod | Mid | Upp |
| Full Review: |  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |
| 16620 Charleston WV MSA | 627 | 35.52 | 1.33 | 1.44 | 20.15 | 15.15 | 55.84 | 50.08 | 22.67 | 33.33 | 35.79 | 33.33 | 27.54 | 36.73 | 40.53 |
| Beckley area non MSA | 698 | 39.55 | 0.00 | 0.00 | 4.25 | 1.72 | 82.95 | 80.66 | 12.80 | 17.62 | 42.11 | 0.00 | 25.00 | 42.30 | 44.44 |
| Limited Review: |  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |
| 25180 Hagerstown- <br> Martinsburg MD-WV <br>  <br> Morgan Co WV) | 183 | 10.37 | 0.00 | 0.00 | 16.67 | 16.39 | 83.33 | 83.61 | 0.00 | 0.00 | 25.67 | 0.00 | 21.88 | 26.20 | 0.00 |
| 47894 Washington-Arlington-Alexandria DC-MD-VA-WV MD (Jefferson Co WV) | 75 | 4.25 | 0.00 | 0.00 | 71.13 | 78.67 | 28.87 | 21.33 | 0.00 | 0.00 | 37.66 | 0.00 | 39.29 | 33.33 | 0.00 |
| Harrison Co WV non- MSA | 43 | 2.44 | 0.00 | 0.00 | 2.77 | 0.00 | 65.65 | 46.51 | 31.58 | 53.49 | 6.45 | 0.00 | 0.00 | 5.13 | 8.00 |
| Jackson \& Mason Co WV non-MSA | 139 | 7.88 | 0.00 | 0.00 | 0.00 | 0.00 | 88.01 | 87.05 | 11.99 | 12.95 | 37.58 | 0.00 | 0.00 | 34.78 | 57.89 |

[^21]Institution ID: CITY NATIONAL BANK OF WV (10000014807) (Included)
Table 4. Geographic Distribution of Home Mortgage Refinance Loans

| Geographic Distribution: HOME MORTGAGE REFINANCE TO DECEMBER 31, 2011 |  |  |  |  | Geography: STATE OF WEST VIRGINIA |  |  |  |  |  | Evaluation Period: JULY 1, 2009 |  |  |  |  |
| :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: |
| Assessment Area: | Total Home Mortgage Refinance Loans |  | Low-Income Geographies |  | ModerateIncome Geographies |  | Middle-Income Geographies |  | Upper-Income Geographies |  | Market Share (\%) by Geography* |  |  |  |  |
|  | \# | $\begin{gathered} \hline \% \\ \text { of } \\ \text { Total } \end{gathered}$ | \% Owner Occ Units *** | \% <br> BANK <br> Loans <br> **** | \% Owner Occ Units *** | $\begin{gathered} \hline \% \\ \text { BANK } \\ \text { Loans } \end{gathered}$ | \% Owner Occ Units *** | \% BANK Loans | \% Owner Occ Units *** | \% | Overall | Low | Mod | Mid | Upp |
| Full Review: |  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |
| 16620 Charleston WV MSA | 745 | 39.90 | 1.33 | 0.81 | 20.15 | 9.53 | 55.84 | 51.54 | 22.67 | 38.12 | 8.72 | 23.08 | 9.73 | 8.51 | 8.63 |
| Beckley area non MSA | 705 | 37.76 | 0.00 | 0.00 | 4.25 | 2.98 | 82.95 | 76.17 | 12.80 | 20.85 | 12.41 | 0.00 | 25.00 | 11.70 | 14.14 |
| Limited Review: |  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |
| 25180 HagerstownMartinsburg MD-WV MSA (Berkeley \& Morgan Co WV) | 137 | 7.34 | 0.00 | 0.00 | 16.67 | 13.14 | 83.33 | 86.86 | 0.00 | 0.00 | 2.99 | 0.00 | 2.42 | 3.06 | 0.00 |
| 47894 Washington-Arlington-Alexandria DC-MD-VA-WV MD (Jefferson Co WV) | 59 | 3.16 | 0.00 | 0.00 | 71.13 | 83.05 | 28.87 | 16.95 | 0.00 | 0.00 | 1.97 | 0.00 | 2.54 | 0.82 | 0.00 |
| Harrison Co WV non-MSA | 36 | 1.93 | 0.00 | 0.00 | 2.77 | 8.33 | 65.65 | 30.56 | 31.58 | 61.11 | 2.43 | 0.00 | 14.29 | 1.60 | 2.63 |
| Jackson \& Mason Co WV non-MSA | 185 | 9.91 | 0.00 | 0.00 | 0.00 | 0.00 | 88.01 | 84.86 | 11.99 | 15.14 | 18.75 | 0.00 | 0.00 | 19.11 | 16.90 |

* Based on 2011 Peer Mortgage Data (USPR)
** Home refinance loans originated and purchased in the MA/AA as a percentage of all home refinance loans originated and purchased in the rated area.
*** Percentage of Owner Occupied Units is the number of owner occupied units in a particular geography divided by the number of owner occupied housing units in the area based on
2000 Census information.
**** Data shown includes only One to Four-family and manufactured housing. (Property type of 1 or 2)

Institution ID: CITY NATIONAL BANK OF WV (10000014807) (Included)
Table 5. Geographic Distribution of Multifamily Loans

| Geographic Distribution: MULTIFAMILY TO DECEMBER 31, 2011 |  |  |  |  | Geography: STATE OF WEST VIRGINIA |  |  |  |  |  | Evaluation Period: JULY 1, 2009 |  |  |  |  |
| :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: |
| Assessment Area: | Total Multifamily Loans |  | Low-Income Geographies |  | ModerateIncome Geographies |  | Middle-Income Geographies |  | Upper-Income Geographies |  | Market Share (\%) by Geography* |  |  |  |  |
|  | \# | $\begin{gathered} \hline \% \\ \text { of } \\ \text { Total } \\ * * \end{gathered}$ | $\begin{gathered} \hline \% \\ \text { of MF } \\ \text { Units } \end{gathered}$ | \% <br> BANK <br> Loans <br> **** | $\begin{gathered} \hline \% \\ \text { MF } \\ \text { Units } \end{gathered}$ |  | $\begin{gathered} \text { \% } \\ \text { MF } \\ \text { Units } \end{gathered}$ |  | $\begin{gathered} \hline \% \\ \text { MF } \\ \text { Mnits } \\ \text { *** } \end{gathered}$ | \% BANK Loans | Overall | Low | Mod | Mid | Upp |
| Full Review: |  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |
| 16620 Charleston WV MSA | 9 | 45.00 | 6.83 | 0.00 | 14.24 | 0.00 | 44.85 | 55.56 | 34.08 | 44.44 | 6.90 | 0.00 | 0.00 | 0.00 | 40.00 |
| Beckley area non MSA | 8 | 40.00 | 0.00 | 0.00 | 11.06 | 0.00 | 70.67 | 75.00 | 18.27 | 25.00 | 20.00 | 0.00 | 0.00 | 15.38 | 50.00 |
| Limited Review: |  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |
| 25180 HagerstownMartinsburg MD-WV MSA (Berkeley \& Morgan Co WV) | 0 | 0.00 | 0.00 | 0.00 | 60.97 | 0.00 | 39.03 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 |
| 47894 Washington-Arlington-Alexandria DC-MD-VA-WV MD (Jefferson Co WV) | 0 | 0.00 | 0.00 | 0.00 | 79.05 | 0.00 | 20.95 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 |
| Harrison Co WV non-MSA | 1 | 5.00 | 0.00 | 0.00 | 1.01 | 0.00 | 78.49 | 0.00 | 20.50 | 100.00 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 |
| Jackson \& Mason Co WV non-MSA | 2 | 10.00 | 0.00 | 0.00 | 0.00 | 0.00 | 97.29 | 100.00 | 2.71 | 0.00 | 50.00 | 0.00 | 0.00 | 50.00 | 0.00 |

* Based on 2011 Peer Mortgage Data (USPR)
** Multi-family loans originated and purchased in the MA/AA as a percentage of all multi-family loans originated and purchased in the rated area
*** Percentage of Multi Family Units is the number of multi family units in a particular geography divided by the number of multifamily housing units in the area based on 2000 Census information.
**** Multifamily loan distribution includes Home Purchases, Home Improvement and Refinances.


## Institution ID: CITY NATIONAL BANK OF WV (10000014807) (Included)

Table 6. Geographic Distribution of Small Loans to Businesses

| Geographic Distribution: SMALL LOANS TO BUSINESSES DECEMBER 31, 2011 |  |  |  |  | Geography: STATE OF WEST VIRGINIA |  |  |  |  | Evaluation Period: JULY 1, 2009 TO |  |  |  |  |  |
| :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: |
| Assessment Area: | Total Bus Lo | Small ness ans | Low-Income Geographies |  | Moderate-Income Geographies |  | Middle-Income Geographies |  | Upper-Income Geographies |  | Market Share (\%) by Geography* |  |  |  |  |
|  | \# | \% of Total ** | $\%$ of $\substack{\text { Businesses } \\ * * *}$ | $\begin{gathered} \hline \% \\ \text { BANK } \end{gathered}$ Loans | $\%$ <br> of <br> $\substack{\text { Businesses } \\ * * *}$ |  | $\%$ <br> of <br> $\substack{\text { Businesses } \\ * * *}$ |  | $\%$ <br> of <br> $\substack{\text { Businesses } \\ * * *}$ |  | Overall | Low | Mod | Mid | Upp |
| Full Review: |  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |
| 16620 Charleston WV MSA | 262 | 31.19 | 10.00 | 8.02 | 16.39 | 16.03 | 46.35 | 43.89 | 27.26 | 32.06 | 3.26 | 3.46 | 3.74 | 3.46 | 3.32 |
| Beckley area non MSA | 467 | 55.60 | 0.00 | 0.00 | 5.23 | 3.43 | 78.45 | 73.66 | 16.32 | 22.91 | 6.24 | 0.00 | 4.00 | 6.34 | 9.27 |
| Limited Review: |  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |
| 25180 HagerstownMartinsburg MD-WV MSA (Berkeley \& Morgan Co WV) | 61 | 7.26 | 0.00 | 0.00 | 22.83 | 19.67 | 77.17 | 80.33 | 0.00 | 0.00 | 2.34 | 0.00 | 2.65 | 2.42 | 0.00 |
| 47894 Washington- <br> Arlington-Alexandria DC- <br> MD-VA-WV MD (Jefferson <br> Co WV) | 9 | 1.07 | 0.00 | 0.00 | 71.38 | 66.67 | 28.62 | 33.33 | 0.00 | 0.00 | 0.42 | 0.00 | 0.00 | 1.23 | 0.00 |
| Harrison Co WV non-MSA | 19 | 2.26 | 0.00 | 0.00 | 3.17 | 5.26 | 55.43 | 73.68 | 41.40 | 21.05 | 0.94 | 0.00 | 0.00 | 1.73 | 0.33 |
| Jackson \& Mason Co WV non-MSA | 22 | 2.62 | 0.00 | 0.00 | 0.00 | 0.00 | 90.42 | 90.91 | 9.58 | 9.09 | 3.60 | 0.00 | 0.00 | 4.10 | 4.08 |

[^22]Institution ID: CITY NATIONAL BANK OF WV (10000014807) (Included)
Table 7. Geographic Distribution of Small Loans to Farms

| Geographic Distribution: SMALL LOANS TO FARMS TO DECEMBER 31, 2011 |  |  |  |  | Geography: STATE OF WEST VIRGINIA |  |  |  |  |  | Evaluation Period: JULY 1, 2009 |  |  |  |  |
| :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: |
| Assessment Area: | Total Smal Loans | Farm | Low-Income Geographies |  | ModerateIncome Geographies |  | Middle-Income Geographies |  | Upper-Income Geographies |  | Market Share (\%) by Geography* |  |  |  |  |
|  | \# |  |  | \% BANK Loans |  | \% BANK Loans |  | \% Loans |  | \% BANK Loans | Overall | Low | Mod | Mid | Upp |
| Full Review: |  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |
| 16620 Charleston WV MSA | 2 | 6.25 | 3.20 | 0.00 | 13.87 | 0.00 | 56.53 | 50.00 | 26.40 | 50.00 | 15.38 | 0.00 | 0.00 | 11.11 | 25.00 |
| Beckley area non MSA | 24 | 75.00 | 0.00 | 0.00 | 2.65 | 0.00 | 76.91 | 45.83 | 20.44 | 54.17 | 15.48 | 0.00 | 0.00 | 10.34 | 30.43 |
| Limited Review: |  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |
| 25180 HagerstownMartinsburg MD-WV MSA (Berkeley \& Morgan County WV) | 0 | 0.00 | 0.00 | 0.00 | 8.86 | 0.00 | 91.14 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 |
| 47894 Washington-Arlington-Alexandria DC-MD-VA-WV MD (Jefferson County WV) | 1 | 3.13 | 0.00 | 0.00 | 74.75 | 100.00 | 25.25 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 |
| Harrison Co WV non-MSA | 3 | 9.38 | 0.00 | 0.00 | 2.88 | 0.00 | 49.04 | 100.00 | 48.08 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 |
| Jackson \& Mason Co WV non-MSA | 2 | 6.25 | 0.00 | 0.00 | 0.00 | 0.00 | 93.24 | 100.00 | 6.76 | 0.00 | 28.57 | 0.00 | 0.00 | 40.00 | 0.00 |

[^23]Institution ID: CITY NATIONAL BANK OF WV (10000014807) (Included)
Table 8. Borrower Distribution of Home Purchase Loans

| Borrower Distribution: HOME PURCHASE Geography: STATE OF WEST VIRGINIA Evaluation Period: JULY 1, 2009TO DECEMBER 31, 2011 |  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |
| :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: |
| Assessment Area: | Total Home Purchase Loans |  | Low-Income Borrowers |  | Moderate-Income Borrowers |  | Middle-Income Borrowers |  | Upper-Income Borrowers |  | Market Share* |  |  |  |  |
|  | \# | \% of Total ** | $\begin{gathered} \hline \% \\ \underset{* * *}{\text { Families }} \end{gathered}$ | \% BANK Loans **** | $\begin{gathered} \hline \% \\ \text { Families }^{7} \end{gathered}$ | \% BANK Loans **** | $\begin{gathered} \hline \% \\ \substack{\text { Familie } \\ \mathrm{s}^{* * *}} \end{gathered}$ | \% BANK Loans **** | $\begin{gathered} \% \\ \text { Familie } \\ \mathrm{s}^{* * *} \end{gathered}$ | \% BANK Loans *大** | Overall | Low | Mod | Mid | Upp |
| Full Review: |  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |
| 16620 Charleston WV MSA | 512 | 43.39 | 21.80 | 5.52 | 17.65 | 18.61 | 20.13 | 20.86 | 40.41 | 55.01 | 9.04 | 4.06 | 8.78 | 5.88 | 12.00 |
| Beckley area non MSA | 405 | 34.32 | 20.99 | 1.32 | 17.77 | 10.03 | 21.11 | 20.05 | 40.14 | 68.60 | 9.38 | 3.95 | 6.35 | 7.69 | 11.36 |
| Limited Review: |  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |
| 25180 Hagerstown-Martinsburg MD-WV MSA (Berkeley \& Morgan County WV) | 124 | 10.51 | 20.10 | 7.08 | 20.60 | 13.27 | 24.62 | 22.12 | 34.68 | 57.52 | 2.14 | 1.10 | 1.07 | 1.59 | 4.75 |
| 47894 Washington-ArlingtonAlexandria DC-MD-VA-WV MD (Jefferson County WV) | 48 | 4.07 | 31.28 | 18.18 | 23.98 | 38.64 | 24.39 | 18.18 | 20.35 | 25.00 | 1.98 | 1.18 | 1.72 | 1.50 | 5.00 |
| Harrison County WV non-MSA | 18 | 1.53 | 17.82 | 6.25 | 16.11 | 6.25 | 18.88 | 12.50 | 47.20 | 75.00 | 1.67 | 0.00 | 1.75 | 0.00 | 2.36 |
| Jackson \& Mason Co WV nonMSA | 73 | 6.19 | 19.16 | 2.82 | 15.99 | 7.04 | 20.04 | 23.94 | 44.81 | 66.20 | 11.97 | 10.00 | 4.44 | 10.00 | 15.09 |

[^24]
## Institution ID: CITY NATIONAL BANK OF WV (10000014807) (Included)

Table 9. Borrower Distribution of Home Improvement Loans

| Borrower Distribution: HOME IMPROVEMENT |  |  |  |  | Geography: STATE OF WEST VIRGINIA |  |  |  | Evaluation Period: JULY 1, 2009 TO DECEMBER 31, 2011 |  |  |  |  |  |  |
| :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: |
|  | Total Home Improvement Loans |  | Low-Income Borrowers |  | Moderate-Income Borrowers |  | Middle-Income Borrowers |  | Upper-Income Borrowers |  | Market Share* |  |  |  |  |
| Assessment Area: | \# | \% <br> of Total** | \% $\underset{* * *}{\text { Families }}$ |  | $\begin{gathered} \% \\ \text { Families }^{8} \end{gathered}$ |  | $\underset{* * *}{\text { Families }}$ |  | $\underset{* * *}{\text { Families }}$ |  | Overall | Low | Mod | Mid | Upp |
| Full Review: |  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |
| 16620 Charleston WV <br> MSA | 627 | 35.52 | 21.80 | 8.89 | 17.65 | 20.13 | 20.13 | 24.50 | 40.41 | 46.48 | 35.63 | 26.74 | 30.82 | 37.57 | 39.73 |
| Beckley area non MSA | 698 | 39.55 | 20.99 | 5.79 | 17.77 | 12.18 | 21.11 | 24.37 | 40.14 | 57.65 | 42.55 | 22.41 | 30.34 | 49.66 | 45.90 |
| Limited Review: |  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |
| 25180 Hagerstown- <br> Martinsburg MD-WV <br>  <br> Morgan County WV) | 183 | 10.37 | 20.10 | 15.00 | 20.60 | 19.44 | 24.62 | 26.67 | 34.68 | 38.89 | 26.00 | 17.78 | 17.54 | 28.79 | 34.15 |
| City NB 47894 <br> Washington-Arlington- <br> Alexandria DC-MD- <br> VA-WV MD (Jefferson <br> County WV) | 75 | 4.25 | 31.28 | 23.29 | 23.98 | 21.92 | 24.39 | 28.77 | 20.35 | 26.03 | 38.67 | 42.86 | 26.32 | 50.00 | 36.84 |
| Harrison County WV non-MSA | 43 | 2.44 | 17.82 | 6.98 | 16.11 | 2.33 | 18.88 | 23.26 | 47.20 | 67.44 | 6.67 | 0.00 | 0.00 | 7.14 | 8.89 |
| Jackson \& Mason County WV non-MSA | 139 | 7.88 | 19.16 | 4.41 | 15.99 | 16.18 | 20.04 | 25.74 | 44.81 | 53.68 | 38.06 | 33.33 | 35.29 | 30.30 | 43.42 |

[^25]Institution ID：CITY NATIONAL BANK OF WV（10000014807）（Included）
Table 10．Borrower Distribution of Home Mortgage Refinance Loans

| Borrower Distribution：HOME MORTGAGE REFINANCE |  |  |  |  | Geography：STATE OF WEST VIRGINIA |  |  |  | Evaluation Period：JULY 1， 2009 TO DECEMBER 31， 2011 |  |  |  |  |  |  |
| :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: |
| Assessment Area： | Total Home <br> Mortgage <br> Refinance Loans |  | Low－Income Borrowers |  | Moderate－Income Borrowers |  | Middle－Income Borrowers |  | Upper－Income Borrowers |  | Market Share＊ |  |  |  |  |
|  | \＃ | $\begin{gathered} \text { \% } \\ \text { of Total } \\ \text { ** } \end{gathered}$ | $\underset{\substack{\text { \％＊}}}{\text { Families＊}}$ |  | $\begin{gathered} \% \\ \text { Families } \end{gathered}$ |  | \％ $\underset{\star * *}{\text { Families }}$ |  | $\underset{* * *}{\text { Families }}$ |  | Overall | Low | Mod | Mid | Upp |
| Full Review： |  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |
| 16620 Charleston WV MSA | 745 | 39.90 | 21.80 | 5.76 | 17.65 | 15.83 | 20.13 | 21.73 | 40.41 | 56.69 | 9.46 | 7.87 | 11.53 | 7.81 | 9.77 |
| Beckley area non MSA | 705 | 37.76 | 20.99 | 5.22 | 17.77 | 14.61 | 21.11 | 24.89 | 40.14 | 55.29 | 13.86 | 11.21 | 13.67 | 16.85 | 13.11 |
| Limited Review： |  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |
| 25180 Hagerstown－ Martinsburg MD－WV MSA | 137 | 7.34 | 20.10 | 12.88 | 20.60 | 25.00 | 24.62 | 28.03 | 34.68 | 34.09 | 3.91 | 7.97 | 4.79 | 3.28 | 2.98 |
| 47894 Washington－ Arlington－Alexandria DC－MD－VA－WV MD | 59 | 3.16 | 31.28 | 27.27 | 23.98 | 25.45 | 24.39 | 23.64 | 20.35 | 23.64 | 2.50 | 5.33 | 2.07 | 1.19 | 2.55 |
| Harrison Co WV non－MSA | 36 | 1.93 | 17.82 | 5.71 | 16.11 | 5.71 | 18.88 | 22.86 | 47.20 | 65.71 | 2.64 | 0.00 | 1.85 | 5.66 | 2.19 |
| Jackson \＆Mason Co WV non－MSA | 185 | 9.91 | 19.16 | 3.31 | 15.99 | 16.57 | 20.04 | 25.41 | 44.81 | 54.70 | 20.57 | 10.53 | 35.71 | 23.76 | 17.18 |

[^26]Institution ID: CITY NATIONAL BANK OF WV (10000014807) (Included)
Table 11. Borrower Distribution of Small Loans to Businesses

| Borrower Distribution: SMALL LOANS TO BUSINESSES DECEMBER 31, 2011 |  |  |  | Geography: STATE OF WEST VIRGINIA |  |  | Evaluation Period: JULY 1, 2009 TO |  |  |
| :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: |
| Assessment Area: | Total Small Loans to Businesses |  | Businesses With Revenues of \$1 million or less |  | Loans by Original Amount Regardless of BusinessSize |  |  | Market Share* |  |
|  | \# | $\begin{gathered} \hline \% \\ \text { of Total } \\ * * \end{gathered}$ | \% of $\substack{\text { Businesses } \\ * * *}$ | $\qquad$ <br> BANK <br> Loans | $\begin{gathered} \$ 100,000 \text { or } \\ \text { less } \end{gathered}$ | $\begin{gathered} >\$ 100,000 \text { to } \\ \$ 250,000 \end{gathered}$ | $\begin{gathered} >\$ 250,000 \text { to } \\ \$ 1,000,000 \end{gathered}$ | All | Rev\$ 1 Million or Less |
| Full Review: |  |  |  |  |  |  |  |  |  |
| 16620 Charleston WV MSA | 262 | 31.19 | 59.24 | 62.21 | 62.60 | 17.56 | 19.85 | 3.26 | 5.21 |
| Beckley area non MSA | 467 | 55.60 | 60.20 | 70.88 | 65.52 | 17.34 | 17.13 | 6.24 | 9.42 |
| Limited Review: |  |  |  |  |  |  |  |  |  |
| 25180 Hagerstown- <br> Martinsburg MD- <br> WV MSA | 61 | 7.26 | 59.64 | 93.44 | 80.33 | 14.75 | 4.92 | 2.34 | 4.23 |
| 47894 Washington- <br> Arlington- <br> Alexandria DC-MD- <br> VA-WV MD | 9 | 1.07 | 64.46 | 100.00 | 77.78 | 22.22 | 0.00 | 0.42 | 0.86 |
| Harrison County WV non-MSA | 19 | 2.26 | 55.35 | 78.95 | 63.16 | 26.32 | 10.53 | 0.94 | 2.11 |
| Jackson \& Mason Co WV non-MSA | 22 | 2.62 | 57.37 | 59.09 | 50.00 | 9.09 | 40.91 | 3.60 | 4.57 |

[^27]Institution ID: CITY NATIONAL BANK OF WV (10000014807) (Included)
Table 12. Borrower Distribution of Small Loans to Farms

| Borrower Distribution: SMALL LOANS TO FARMS DECEMBER 31, 2011 |  |  |  | Geography: STATE OF WEST VIRGINIA |  |  | Evaluation Period: JULY 1, 2009 TO |  |  |
| :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: |
| Assessment Area: | Total Small Loans to Farms |  | Farms With Revenues of \$1 million or less |  | Loans by Original Amount Regardless of Farm Size |  |  | Market Share* |  |
|  | \# | \% of Total ** | \% of Farms | $\begin{gathered} \text { \% } \\ \underset{* * * *}{\text { BANK Loans }} \end{gathered}$ | \$100,000 or less | $\begin{aligned} & >\$ 100,000 \\ & \text { to } \$ 250,000 \end{aligned}$ | $\begin{gathered} >\$ 250,000 \text { to } \\ \$ 500,000 \end{gathered}$ | All | Rev\$ 1 Million or Less |
| Full Review: |  |  |  |  |  |  |  |  |  |
| 16620 Charleston WV MSA | 2 | 6.25 | 97.87 | 50.00 | 50.00 | 0.00 | 50.00 | 15.38 | 12.50 |
| Beckley area non MSA | 24 | 75.00 | 98.13 | 100.00 | 75.00 | 20.83 | 4.17 | 15.48 | 18.31 |
| Limited Review: |  |  |  |  |  |  |  |  |  |
| 25180 HagerstownMartinsburg MSA | 0 | 0.00 | 97.47 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 |
| 47894 Washington-Arlington-Alexandria MD | 1 | 3.13 | 97.52 | 100.00 | 0.00 | 100.00 | 0.00 | 0.00 | 0.00 |
| Harrison Co WV nonMSA | 3 | 9.38 | 97.12 | 100.00 | 100.00 | 0.00 | 0.00 | 0.00 | 0.00 |
| Jackson \& Mason Co WV non-MSA | 2 | 6.25 | 100.00 | 100.00 | 50.00 | 0.00 | 50.00 | 28.57 | 40.00 |

[^28]Institution ID: CITY NATIONAL BANK OF WV (10000014807) (Included)
Table 14. Qualified Investments

| QUALIFIED INVESTMENTS 2011 |  |  | Geography: STATE OF WV |  |  | Evaluation Period: JULY 1, 2009 TO DECEMBER 31, |  |  |  |
| :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: |
| Assessment Area: | Prior Period Investments* |  | Current Period Investments |  | Total Investments |  |  | Unfunded Commitments** |  |
|  | \# | \$(000's) | \# | \$(000's) | \# | \$(000's) | \% of Total | \# | \$(000's) |
| Full Review: |  |  |  |  |  |  |  |  |  |
| 16620 Charleston WV MSA | 0 | 0 | 2 | 6,610 | 2 | 6,610 | 23.27 | 0 | 0 |
| Beckley area non MSA | 7 | 3,918 | 2 | 2,490 | 9 | 6,408 | 22.56 | 0 | 0 |
| Limited Review: |  |  |  |  |  |  |  |  |  |
| 25180 HagerstownMartinsburg MSA | 14 | 4,635 | 2 | 1,805 | 16 | 6,440 | 22.67 | 0 | 0 |
| 47894 Washington-Arlington-Alexandria MD | 0 | 0 | 0 | 0 | 0 | 0 | 0.00 | 0 | 0 |
| Harrison Co WV nonMSA | 0 | 0 | 0 | 0 | 0 | 0 | 0.00 | 0 | 0 |
| Jackson \& Mason Co WV non-MSA | 0 | 0 | 0 | 0 | 0 | 0 | 0.00 | 0 | 0 |
| Statewide / Regional | 5 | 7,177 | 1 | 1,767 | 6 | 8,944 | 31.49 | 0 | 0 |

[^29]Institution ID: CITY NATIONAL BANK OF WV (10000014807) (Included)
Table 15. Distribution of Branch Delivery System and Branch Openings/Closings

| DISTRIBUTION OF BRANCH DELIVERY SYSTEM AND BRANCH OPENINGS/CLOSINGS Geography: STATEEvaluation Period: JULY 1, 2009 TO DECEMBER 31, 2011 |  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |
| :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: |
| MA/Assessment Area: | Deposits <br> $\%$ <br> of Rated <br> Area <br> Deposits <br> in AA | Branches |  |  |  |  |  | Branch Openings/Closings |  |  |  |  |  | Population |  |  |  |
|  |  | \# <br> of BANK <br> Branches | \% <br> of Rated <br> Area Branches in AA | Location of Branches by Income of Geographies (\%) |  |  |  | \# of Branch Openings | \# <br> of Branch Closings | Net change in Location of Branches (+ or - ) |  |  |  | \% of Population within Each Geography |  |  |  |
|  |  |  |  | Low | Mod | Mid | Upp |  |  | Low | Mod | Mid | Upp | Low | Mod | Mid | Upp |
| Full Review: |  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |
| $\begin{aligned} & 16620 \\ & \text { Charleston WV } \\ & \text { MSA } \end{aligned}$ | 34.78 | 17 | 32.69 | 0.00 | 29.41 | 41.18 | 29.41 | 1 | 0 | 0 | 0 | +1 | 0 | 1.70 | 21.15 | 54.97 | 22.19 |
| Beckley area non MSA | 44.02 | 21 | 40.38 | 0.00 | 14.29 | 71.43 | 14.29 | 0 | 0 | 0 | 0 | 0 | 0 | 0.00 | 4.48 | 82.84 | 12.68 |
| Limited Review: |  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |
| $\begin{aligned} & 25180 \\ & \text { Hagerstown- } \\ & \text { Martinsburg } \\ & \text { MSA } \\ & \hline \end{aligned}$ | 8.13 | 5 | 9.62 | 0.00 | 40.00 | 60.00 | 0.00 | 1 | 1 | 0 | 0 | 0 | 0 | 0.00 | 20.17 | 79.83 | 0.00 |
| 47894 <br> Washington- <br> Arlington- <br> Alexandria MD | 2.35 | 2 | 3.85 | 0.00 | 100.00 | 0.00 | 0.00 | 0 | 0 | 0 | 0 | 0 | 0 | 0.00 | 70.33 | 29.67 | 0.00 |
| Harrison Co WV non-MSA | 1.96 | 2 | 3.85 | 0.00 | 50.00 | 0.00 | 50.00 | 0 | 1 | 0 | 0 | -1 | 0 | 0.00 | 3.45 | 66.73 | 29.82 |
| Jackson \& Mason Co WV non MSA | 8.75 | 5 | 9.62 | 0.00 | 0.00 | 80.00 | 20.00 | 0 | 0 | 0 | 0 | 0 | 0 | 0.00 | 0.00 | 88.07 | 11.93 |

Institution ID: CITY NATIONAL BANK OF WV (10000014807) (Included)
Distribution of Branch and ATM Delivery System

| Distribution of Branch and ATM Delivery System 2011 |  |  |  | Geography: STATE OF WEST VIRGINIA |  |  |  |  |  | Evaluation Period: JULY 1, 2009 TO DECEMBER 31, |  |  |  |  |  |  |  |
| :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: |
| MA/Assessment Area: | Deposits <br> $\%$ <br> of Total <br> Bank <br> Deposits | Branches |  |  |  |  |  | ATMs |  |  |  |  |  | Population |  |  |  |
|  |  | \# of Bank Branches | \% <br> of Total Bank Branches | Location of Branches by Income of Geographies (\%) |  |  |  | \# <br> of Bank ATMs | \%ofTotalBankATMs | Location of ATMs by Income of Geographies |  |  |  | \% of Population within Each Geography |  |  |  |
|  |  |  |  | Low | Mod | Mid | Upp |  |  | Low | Mod | Mid | Upp | Low | Mod | Mid | Upp |
| Full Review: |  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |
| 16620 <br> Charleston WV MSA | 34.78 | 17 | 32.69 | 0.00 | 29.41 | 41.18 | 29.41 | 19 | 33.96 | 0 | 5 | 9 | 5 | 1.70 | 21.15 | 54.97 | 22.19 |
| Beckley area non MSA | 44.02 | 21 | 40.38 | 0.00 | 14.29 | 71.43 | 14.29 | 21 | 39.62 | 0 | 3 | 15 | 3 | 0.00 | 4.48 | 82.84 | 12.68 |
| Limited Review: |  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |
| $25180$ <br> HagerstownMartinsburg MSA | 8.13 | 5 | 9.62 | 0.00 | 40.00 | 60.00 | 0.00 | 5 | 9.43 | 0 | 2 | 3 | 0 | 0.00 | 20.17 | 79.83 | 0.00 |
| 47894 <br> Washington- <br> Arlington- <br> Alexandria MD | 2.35 | 2 | 3.85 | 0.00 | 100.00 | 0.00 | 0.00 | 2 | 3.77 | 0 | 2 | 0 | 0 | 0.00 | 70.33 | 29.67 | 0.00 |
| Harrison Co WV non MSA | 1.96 | 2 | 3.85 | 0.00 | 50.00 | 0.00 | 50.00 | 2 | 3.77 | 0 | 1 | 0 | 1 | 0.00 | 3.45 | 66.73 | 29.82 |
| Jackson \& Mason Co WV non-MSA | 8.75 | 5 | 9.62 | 0.00 | 0.00 | 80.00 | 20.00 | 5 | 9.43 | 0 | 0 | 4 | 1 | 0.00 | 0.00 | 88.07 | 11.93 |

## State of Kentucky

Institution ID: CITY NATIONAL BANK OF WV (10000014807) (Included)
Table 1. Lending Volume

| LENDING VOLUME |  | Geography: STATE OF KENTUCKY |  |  |  |  | Evaluation Period: JULY 1, 2009 TO DECEMBER 31, 2011 |  |  |  |  |  |
| :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: |
| MA/Assessment Area: | \% of <br> Rated Area Loans (\#) in MA/AA* | Home Mortgage |  | Small Loans to Businesses |  | Small Loans to Farms |  | CommunityDevelopmentLoans** |  | Total Reported Loans |  | \% of <br> Rated <br> Area Deposits in MA/AA*** |
|  |  | \# | \$ (000's) | \# | \$ (000's) | \# | \$ (000's) | \# | \$ (000's) | \# | \$(000's) |  |
| Full Review: |  |  |  |  |  |  |  |  |  |  |  |  |
| Johnson County KY non MSA | 78.90 | 157 | 13,152 | 112 | 11,114 | 4 | 78 | 1 | 579 | 274 | 24,923 | 81.59 |
| Limited Review: |  |  |  |  |  |  |  |  |  |  |  |  |
| Carter County KY non MSA | 21.10 | 65 | 4,206 | 8 | 1,121 | 0 | 0 | 1 | 639 | 74 | 5,966 | 18.41 |

[^30]Institution ID: CITY NATIONAL BANK OF WV (10000014807) (Included)
Table 1. Other Products

| LENDING VOLUME |  | Geography: STATE OF KENTUCKY |  |  |  |  |  | Evaluation Period: JULY 1, 2009 TO DECEMBER 31, 2011 |  |  |  |  |  |  |
| :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: |
| Assessment Area | \% of <br> Rated <br> Area <br> Loans <br> (\#) in <br> MA/AA* | Total Optional Loans** |  | Small Business Real Estate Secured** |  | Home Equity** |  | Motor Vehicle** |  | Credit Card** |  | Other Secured Consumer** |  | \% of <br> Rated Area Deposits in $A A^{* * *}$ |
|  |  | \# | $\begin{gathered} \$ \\ (000 \text { 's) } \end{gathered}$ | \# | $\begin{gathered} \$ \\ (000 \text { 's) } \end{gathered}$ | \# | $\begin{gathered} \$ \\ (000 \text { 's) } \end{gathered}$ | \# | $\begin{gathered} \$ \\ (000 \text { 's) } \end{gathered}$ | \# | $\begin{gathered} \$ \\ \text { (000's) } \end{gathered}$ | \# | \$(000's) |  |
| Full Review: |  |  |  |  |  |  |  |  |  |  |  |  |  |  |
| Johnson County KY non MSA | 0.00 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 81.59 |
| Limited Review: |  |  |  |  |  |  |  |  |  |  |  |  |  |  |
| Carter County KY non MSA | 0.00 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 18.41 |

[^31]Institution ID: CITY NATIONAL BANK OF WV (10000014807) (Included)
Table 1. Other Products

| LENDING VOLUME | Geography: STATE OF KENTUCKY |  |  | Evaluation Period: JULY 1, 2009 TO DECEMBER 31, 2011 |  |  |  |  |
| :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: |
| Assessment Area : | Other Unsecured Consumer Loans* |  |  |  | Other Optional Loans* |  |  |  |
|  | \# |  | \$ (000's) |  | \# |  | \$ (000's) |  |
| Full Review: |  |  |  |  |  |  |  |  |
| Johnson County KY non MSA |  | 0 |  | 0 |  | 0 |  | 0 |
| Limited Review: |  |  |  |  |  |  |  |  |
| Carter County KY non MSA |  | 0 |  | 0 |  | 0 |  | 0 |

[^32]Table 2．Geographic Distribution of Home Purchase Loans

| Geographic Distributi | HOME | R CH |  | graphy | TATE | ENTU |  | luatio | eriod： | Y 1， 2 | TO D | EM | R 31， | 011 |  |
| :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: |
| Assessment Area： | Total Home Purchase Loans |  | Low－Income Geographies |  | Moderate－Income Geographies |  | Middle－Income Geographies |  | Upper－Income Geographies |  | Market Share（\％）by Geography＊ |  |  |  |  |
|  | \＃ | \％ of Total ＊＊ | \％ <br> Owner Occ Units | \% <br> BANK <br> Loans | \％ <br> Owner Occ Units |  | \％ <br> Owner Occ Units大丈大 | \％ <br> BANK <br> Loans | \％ <br> Owner Occ Units |  | Overall | Low | Mod | Mid | Upp |
| Full Review： |  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |
| $\begin{aligned} & \text { Johnson County KY } \\ & \text { non MSA } \end{aligned}$ | 28 | 63.64 | 0.00 | 0.00 | 0.00 | 0.00 | 100.00 | 100.00 | 0.00 | 0.00 | 8.90 | 0.00 | 0.00 | 8.90 | 0.00 |
| Limited Review： |  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |
| Carter County KY non MSA | 16 | 36.36 | 0.00 | 0.00 | 0.00 | 0.00 | 100.00 | 100.00 | 0.00 | 0.00 | 8.11 | 0.00 | 0.00 | 8.11 | 0.00 |

[^33]Institution ID: CITY NATIONAL BANK OF WV (10000014807) (Included)
Table 3. Geographic Distribution of Home Improvement Loans

| Geographic Distribution: HOME IMPROVEMENT <br> 2011 |
| :--- |

[^34]Institution ID: CITY NATIONAL BANK OF WV (10000014807) (Included)
Table 4. Geographic Distribution of Home Mortgage Refinance Loans

| Geographic Distribution: HOME MORTGAGE REFINANCE <br> 2011 |
| :--- |

[^35]Institution ID: CITY NATIONAL BANK OF WV (10000014807) (Included)
Table 5. Geographic Distribution of Multifamily Loans

| Geographic Distribution: MULTIFAMILY |  |  | Geography: STATE OF KENTUCKY |  |  |  | Evaluation Period: JULY 1, 2009 TO DECEMBER 31, 2011 |  |  |  |  |  |  |  |  |
| :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: |
| Assessment Area: | Total Multifamily Loans |  | Low-Income Geographies |  | Moderate-Income Geographies |  | Middle-Income Geographies |  | Upper-Income Geographies |  | Market Share (\%) by Geography* |  |  |  |  |
|  | \# | $\begin{gathered} \% \\ \text { of } \\ \text { Total** } \end{gathered}$ | \% of MF Units *** | \% <br> BANK <br> Loans <br> ** | $\begin{gathered} \hline \% \\ \text { MF } \\ \text { Units } \end{gathered}$ |  | $\begin{gathered} \text { \% } \\ \text { MF } \\ \text { Units } \end{gathered}$ |  | $\begin{gathered} \text { \% } \\ \text { MF } \\ \text { Units } \end{gathered}$ |  | Overall | Low | Mod | Mid | Upp |
| Full Review: |  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |
| Johnson County KY non MSA | 3 | 75.00 | 0.00 | 0.00 | 0.00 | 0.00 | 100.00 | 100.00 | 0.00 | 0.00 | 50.00 | 0.00 | 0.00 | 50.00 | 0.00 |
| Limited Review: |  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |
| Carter County KY non MSA | 1 | 25.00 | 0.00 | 0.00 | 0.00 | 0.00 | 100.00 | 100.00 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 |

[^36]Institution ID: CITY NATIONAL BANK OF WV (10000014807) (Included)
Table 6. Geographic Distribution of Small Loans to Businesses

| Geographic Distribution: SMALL LOANS TO BUSINESSES Geography: STATE OF KENTUCKY Evaluation Period: JULY 1, 2009 TODECEMBER 31, 2011 |  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |
| :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: |
| Assessment Area: | Total Small Business Loans |  | Low-Income Geographies |  | Moderate-Income Geographies |  | Middle-Income Geographies |  | Upper-Income Geographies |  | Market Share (\%) by Geography* |  |  |  |  |
|  | \# | \% of Total ** | $\begin{gathered} \% \\ \text { of Businesses } \\ * * * \end{gathered}$ |  | $\begin{gathered} \% \\ \text { of Businesses } \\ * * * \end{gathered}$ |  | $\frac{\%}{\text { of Businesses }}$ |  | $\frac{\%}{\text { of Businesses }}$ |  | Overall | Low | Mod | Mid | Upp |
| Full Review: |  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |
| Johnson County KY non MSA | 112 | 93.33 | 0.00 | 0.00 | 0.00 | 0.00 | 100.00 | 100.00 | 0.00 | 0.00 | 21.86 | 0.00 | 0.00 | 24.87 | 0.00 |
| Limited Review: |  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |
| Carter County KY non MSA |  | 6.67 | 0.00 | 0.00 | 0.00 | 0.00 | 100.00 | 100.00 | 0.00 | 0.00 | 1.33 | 0.00 | 0.00 | 1.43 | 0.00 |

[^37]Institution ID: CITY NATIONAL BANK OF WV (10000014807) (Included)
Table 7. Geographic Distribution of Small Loans to Farms

| Geographic Distribution: 2011 | SMALL LOANS TO FARMS |  |  | Geography: STATE OF KENTUCKY |  |  |  |  | Evaluation Period: JULY 1, 2009 TO DECEMBER 31, |  |  |  |  |  |  |
| :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: |
| Assessment Area: | Total Smal <br> Loan | $\begin{aligned} & \text { ill Farm } \\ & \text { is } \end{aligned}$ | Low-Income Geographies |  | ModerateIncome Geographies |  | Middle-Income Geographies |  | Upper-Income Geographies |  | Market Share (\%) by Geography* |  |  |  |  |
|  | \# | $\%$ of Total $* *$ | \% of $\underset{* * *}{\text { Farms }}$ | \% BANK Loans | \% of Farms $* * *$ | \% BANK Loans | \% of Farms $* * *$ |  | $\%$ of Farms $* * *$ |  | Overall | Low | Mod | Mid | Upp |
| Full Review: |  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |
| Johnson County KY non MSA | 4 | 100.00 | 0.00 | 0.00 | 0.00 | 0.00 | 100.00 | 100.00 | 0.00 | 0.00 | 75.00 | 0.00 | 0.00 | 75.00 | 0.00 |
| Limited Review: |  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |
| Carter County KY non MSA | 0 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | 100.00 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 |

[^38]Institution ID: CITY NATIONAL BANK OF WV (10000014807) (Included)
Table 8. Borrower Distribution of Home Purchase Loans

| Borrower Distribution: HOME PURCHASE |  |  |  |  | Geography: STATE OF KENTUCKY |  |  | Evaluation Period: JULY 1, 2009 TO DECEMBER 31, 2011 |  |  |  |  |  |  |  |
| :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: |
| Assessment Area: | Total Home Purchase Loans |  | Low-Income Borrowers |  | Moderate-Income Borrowers |  | Middle-Income Borrowers |  | Upper-Income Borrowers |  | Market Share* |  |  |  |  |
|  | \# | $\begin{gathered} \hline \% \\ \text { of } \\ \text { Total } \end{gathered}$ | $\underset{\text { Fa** }}{\stackrel{\%}{\text { Failies }}}$ | \% BANK Loans* *** | $\begin{gathered} \hline \% \\ \underset{10}{\mathrm{Families}} \end{gathered}$ | \% BANK Loans **** | $\begin{gathered} \% \\ \text { Families } \\ * * * \end{gathered}$ | \% BANK Loans **** | $\begin{gathered} \% \\ \underset{* * *}{\%} \\ \hline \text { Families } \end{gathered}$ | \% BANK Loans* *** | Overall | Low | Mod | Mid | Upp |
| Full Review: |  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |
| Johnson County KY non MSA | 28 | 63.64 | 27.63 | 0.00 | 17.75 | 7.69 | 19.12 | 15.38 | 35.50 | 76.92 | 9.49 | 0.00 | 4.35 | 9.38 | 11.84 |
| Limited Review: |  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |
| Carter County KY non MSA | 16 | 36.36 | 25.42 | 0.00 | 16.10 | 26.67 | 20.40 | 40.00 | 38.08 | 33.33 | 8.91 | 0.00 | 11.11 | 13.04 | 6.25 |

[^39]Table 9. Borrower Distribution of Home Improvement Loans


[^40]Institution ID：CITY NATIONAL BANK OF WV（10000014807）（Included）
Table 10．Borrower Distribution of Home Mortgage Refinance Loans

| Borrower Distribution：HOME MORTGAGE REFINANCE 2011 |  |  |  |  |  | Geography：STATE OF KENTUCKY |  |  | Evaluation Period：JULY 1， 2009 TO DECEMBER 31， |  |  |  |  |  |  |
| :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: |
| Assessment Area： | Total Home Mortgage Refinance Loans |  | Low－Income Borrowers |  | Moderate－Income Borrowers |  | Middle－Income Borrowers |  | Upper－Income Borrowers |  | Market Share＊ |  |  |  |  |
|  | \＃ | \％ <br> of <br> Total <br> ＊＊ |  | \％ BANK <br> Loans <br> 大丈大丈 | $\%$ <br> Families <br> 12 |  | $\%$ Families $* * *$ | \％ BANK <br> Loans <br> ＊＊＊＊ |  | \％ <br> BANK <br> Loans <br> 大丈大丈 | Overall | Low | Mod | Mid | Upp |
| Full Review： |  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |
| Johnson County KY non MSA | 62 | 72.09 | 27.63 | 5.00 | 17.75 | 8.33 | 19.12 | 28.33 | 35.50 | 58.33 | 17.07 | 28.57 | 17.39 | 31.43 | 12.86 |
| Limited Review： |  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |
| Carter County KY non MSA | 24 | 27.91 | 25.42 | 0.00 | 16.10 | 13.64 | 20.40 | 36.36 | 38.08 | 50.00 | 8.00 | 0.00 | 5.26 | 12.12 | 7.46 |

[^41]Institution ID: CITY NATIONAL BANK OF WV (10000014807) (Included)
Table 11. Borrower Distribution of Small Loans to Businesses

| Borrower Distribution: SMALL LOANS TO BUSINESSES <br> 2011 |
| :--- |

[^42]Institution ID: CITY NATIONAL BANK OF WV (10000014807) (Included)
Table 12. Borrower Distribution of Small Loans to Farms


[^43]Institution ID: CITY NATIONAL BANK OF WV (10000014807) (Included)
Table 14. Qualified Investments


[^44]Institution ID: CITY NATIONAL BANK OF WV (10000014807) (Included)
Table 15. Distribution of Branch Delivery System and Branch Openings/Closings

| DISTRIBUTION OF BRANCH DELIVERY SYSTEM AND BRANCH OPENINGS/CLOSINGSEvaluation Period: JULY 1, 2009 TO DECEMBER 31, 2011 |  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |
| :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: |
| MA/Assessmen t Area: | Deposits <br> $\%$ <br> of Rated <br> Area <br> Deposits <br> in AA | Branches |  |  |  |  |  | Branch Openings/Closings |  |  |  |  |  | Population |  |  |  |
|  |  | \# <br> of BANK <br> Branche <br> S | \% <br> of Rated Area Branches in $A A$ | $\begin{aligned} & \text { Location of Branches by } \\ & \text { Income of Geographies (\%) } \end{aligned}$ |  |  |  | \# of Branch Opening s | \# <br> of <br> Branch <br> Closings | Net change in Location of Branches (+ or - ) |  |  |  | \% of Population within Each Geography |  |  |  |
|  |  |  |  | Low | Mod | Mid | Upp |  |  | Low | Mod | Mid | Upp | Low | Mod | Mid | Upp |
| Full Review: |  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |
| Johnson County KY non MSA | 81.59 | 2 | 66.67 | 0.00 | 0.00 | 100.00 | 0.00 | 0 | 0 | 0 | 0 | 0 | 0 | 0.00 | 0.00 | 100.00 | 0.00 |
| Limited Review: |  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |
| Carter County KY non MSA | 18.41 | 1 | 33.33 | 0.00 | 0.00 | 0.00 | 00.00 | 0 | 0 | 0 | 0 | 0 | 0 | 0.00 | 0.00 | 100.00 | 0.00 |

Institution ID: CITY NATIONAL BANK OF WV (10000014807) (Included)
Distribution of Branch and ATM Delivery System

| Distribution of Branch and ATM Delivery System |  |  | Geography: STATE OF KENTUCKY |  |  |  |  |  | Evaluation Period: JULY 1, 2009 TO DECEMBER 31, 2011 |  |  |  |  |  |  |  |  |
| :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: |
| MA/Assessment Area: | Deposits <br> $\%$ <br> of Total <br> Bank <br> Deposits | Branches |  |  |  |  |  | ATMs |  |  |  |  |  | Population |  |  |  |
|  |  | \# of Bank Branches | \% of Total Bank Branches | Location of Branches by Income of Geographies (\%) |  |  |  | \#ofBankATMs | $\%$ofTotalBankATMs | Location of ATMs by Income of Geographies |  |  |  | \% of Population within Each Geography |  |  |  |
|  |  |  |  | Low | Mod | Mid | Upp |  |  | Low | Mod | Mid | Upp | Low | Mod | Mid | Upp |
| Full Review: |  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |
| Johnson County KY non MSA | 81.59 | 2 | 66.67 | 0 | 0 | 100 | 0 | 2 | 66.67 | 0 | 0 | 2 | 0 | 0.00 | 0.00 | 100.00 | 0.00 |
| Limited Review: |  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |
| Carter County KY non MSA | 18.41 | 1 | 33.33 | 0 | 0 | 100 | 0 | 1 | 33.33 | 0 | 0 | 1 | 0 | 0.00 | 0.00 | 100.00 | 0.00 |


[^0]:    1 This rating reflects performance within the multistate metropolitan area. The statewide evaluations do not reflect performance in the parts of those states contained within the multistate metropolitan area.

[^1]:    2 For institutions with branches in two or more states in a multistate metropolitan area, this statewide evaluation does not reflect performance in the parts of this state 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.

[^2]:    * Loan Data as of December 31, 2011. Rated area refers to either state or multi-state MA rating area.
    ** The evaluation period for Community Development Loans is from 11/3/2009 through 11/13/2012.
    *** Deposit Data as of June 30, 2012. Rated Area refers to either the state, multi-state MA, or institution, as appropriate.

[^3]:    * Loan Data as of December 31, 2011. Rated area refers to either state or multi-state MA rating area
    ** The evaluation period for Optional Product Line(s) is from July 1, 2009 to December 31, 2011.
    *** Deposit Data as of June 30, 2012. Rated Area refers to either the state, multi-state MA, or institution, as appropriate.

[^4]:    * The evaluation period for Optional Product Line(s) is from July 01, 2009 to December 31, 2011.

[^5]:    * Based on 2011 Peer Mortgage Data (USPR)
    ** Home purchase loans originated and purchased in the MA/AA as a percentage of all home purchase loans originated and purchased in the rated area.
    *** Percentage of Owner Occupied Units is the number of owner occupied units in a particular geography divided by the number of owner occupied housing units in the area based on
    2000 Census information
    **** Data shown includes only One to Four-family and manufactured housing. (Property type of 1 or 2)

[^6]:    * Based on 2011 Peer Mortgage Data (USPR)
    ** Home improvement loans originated and purchased in the MA/AA as a percentage of all home improvement loans originated and purchased in the rated area.
    *** Percentage of Owner Occupied Units is the number of owner occupied units in a particular geography divided by the number of owner occupied housing units in the area based on
    2000 Census information.
    **** Data shown includes only One to Four-family and manufactured housing. (Property type of 1 or 2)

[^7]:    * Based on 2011 Peer Mortgage Data (USPR)
    ** Home refinance loans originated and purchased in the MA/AA as a percentage of all home refinance loans originated and purchased in the rated area.
    *** Percentage of Owner Occupied Units is the number of owner occupied units in a particular geography divided by the number of owner occupied housing units in the area based on
    2000 Census information
    **** Data shown includes only One to Four-family and manufactured housing. (Property type of 1 or 2)

[^8]:    * Based on 2011 Peer Mortgage Data (USPR)
    ** Multi-family loans originated and purchased in the MA/AA as a percentage of all multi-family loans originated and purchased in the rated area.
    $* * *$ Percentage of Multi Family Units is the number of multi family units in a particular geography divided by the number of multifamily housing units in the area based on 2000 Census information.
    **** Multifamily loan distribution includes Home Purchases, Home Improvement and Refinances.

[^9]:    * Based on 2011 Peer Small Business Data - US and PR
    ** Small loans to businesses originated and purchased in the MA/AA as a percentage of all small loans to businesses originated and purchased in the rated area.
    *** Source Data - Dun and Bradstreet (2011).

[^10]:    * Based on 2011 Peer Small Business Data -- US and PR
    ** Small loans to farms originated and purchased in the MA/AA as a percentage of all small loans to farms originated and purchased in the rated area.
    *** Source Data - Dun and Bradstreet (2011).

[^11]:    * Based on 2011 Peer Mortgage Data (USPR)
    ** Home purchase loans originated and purchased in the MA/AA as a percentage of all home purchase loans originated and purchased in the rated area.
    *** Percentage of Families is based on the 2000 Census information.
    **** As a percentage of loans with borrower income information available. No information was available for $2.1 \%$ of loans originated and purchased by bank.
    4 Data shown includes only One to Four-family and manufactured housing. (Property type of 1 or 2)

[^12]:    * Based on 2011 Peer Mortgage Data (USPR)
    ** Home improvement loans originated and purchased in the MA/AA as a percentage of all home improvement loans originated and purchased in the rated area.
    *** Percentage of Families is based on the 2000 Census information.
    **** As a percentage of loans with borrower income information available. No information was available for $1.9 \%$ of loans originated and purchased by bank
    5 Data shown includes only One to Four-family and manufactured housing. (Property type of 1 or 2)

[^13]:    * Based on 2011 Peer Mortgage Data (USPR)
    ** Home refinance loans originated and purchased in the MA/AA as a percentage of all home refinance loans originated and purchased in the rated area.
    *** Percentage of Families is based on the 2000 Census information.
    **** As a percentage of loans with borrower income information available. No information was available for $2.3 \%$ of loans originated and purchased by bank.
    6 Data shown includes only One to Four-family and manufactured housing. (Property type of 1 or 2)

[^14]:    ＊Based on 2011 Peer Small Business Data－－US and PR
    ＊＊Small loans to businesses originated and purchased in the MA／AA as a percentage of all small loans to businesses originated and purchased in the rated area．
    ＊＊＊Businesses with revenues of $\$ 1$ million or less as a percentage of all businesses（Source D\＆B－2011）．
    ＊＊＊＊Small loans to businesses with revenues of $\$ 1$ million or less as a percentage of all loans reported as small loans to businesses．No information was available for $4.08 \%$ of small loans to businesses originated and purchased by the bank．

[^15]:    Based on 2011 Peer Small Business Data -- US and PR
    ** Small loans to farms originated and purchased in the MA/AA as a percentage of all small loans to farms originated and purchased in the rated area.
    *** Farms with revenues of $\$ 1$ million or less as a percentage of all farms (Source D\&B - 2011).
    **** Small loans to farms with revenues of $\$ 1$ million or less as a percentage of all loans reported as small loans to farms. No information was available for $0.00 \%$ of small loans to farms originated and purchased by the bank.

[^16]:    * 'Prior Period Investments' means investments made in a previous period that are outstanding as of the examination date.
    ** 'Unfunded Commitments' means legally binding investment commitments that are tracked and recorded by the institution's financial reporting system.

[^17]:    * Loan Data as of December 31, 2011. Rated area refers to either state or multi-state MA rating area
    * The evaluation period for Community Development Loans is from November 3, 2009 through November 13, 2012.
    *** Deposit Data as of June 30, 2012. Rated Area refers to either the state, multi-state MA, or institution, as appropriate

[^18]:    Loan Data as of December 31, 2011. Rated area refers to either state or multi-state MA rating area

    * The evaluation period for Optional Product Line(s) is from July 01, 2009 to December 31, 2011.
    *** Deposit Data as of June 30, 2012. Rated Area refers to either the state, multi-state MA, or institution, as appropriate.

[^19]:    * The evaluation period for Optional Product Line(s) is from July 01, 2009 to December 31, 2011.

[^20]:    * Based on 2011 Peer Mortgage Data (USPR)
    ** Home purchase loans originated and purchased in the MA/AA as a percentage of all home purchase loans originated and purchased in the rated area.
    *** Percentage of Owner Occupied Units is the number of owner occupied units in a particular geography divided by the number of owner occupied housing units in the area based on
    2000 Census information
    **** Data shown includes only One to Four-family and manufactured housing. (Property type of 1 or 2)

[^21]:    * Based on 2011 Peer Mortgage Data (USPR)
    ** Home improvement loans originated and purchased in the MA/AA as a percentage of all home improvement loans originated and purchased in the rated area.
    *** Percentage of Owner Occupied Units is the number of owner occupied units in a particular geography divided by the number of owner occupied housing units in the area based on
    2000 Census information
    **** Data shown includes only One to Four-family and manufactured housing. (Property type of 1 or 2)

[^22]:    Based on 2011 Peer Small Business Data -- US and PR
    ** Small loans to businesses originated and purchased in the MA/AA as a percentage of all small loans to businesses originated and purchased in the rated area.
    *** Source Data - Dun and Bradstreet (2011).

[^23]:    * Based on 2011 Peer Small Business Data -- US and PR
    ** Small loans to farms originated and purchased in the MA/AA as a percentage of all small loans to farms originated and purchased in the rated area.
    *** Source Data - Dun and Bradstreet (2011).

[^24]:    * Based on 2011 Peer Mortgage Data (USPR)
    ** Home purchase loans originated and purchased in the MA/AA as a percentage of all home purchase loans originated and purchased in the rated area.
    *** Percentage of Families is based on the 2000 Census information.
    **** As a percentage of loans with borrower income information available. No information was available for $5.7 \%$ of loans originated and purchased by bank.
    7 Data shown includes only One to Four-family and manufactured housing. (Property type of 1 or 2)

[^25]:    Based on 2011 Peer Mortgage Data (USPR)
    ** Home improvement loans originated and purchased in the MA/AA as a percentage of all home improvement loans originated and purchased in the rated area. *** Percentage of Families is based on the 2000 Census information.
    **** As a percentage of loans with borrower income information available. No information was available for $3.7 \%$ of loans originated and purchased by bank
    8 Data shown includes only One to Four-family and manufactured housing. (Property type of 1 or 2 )

[^26]:    ＊Based on 2011 Peer Mortgage Data（USPR）
    ＊＊Home refinance loans originated and purchased in the MA／AA as a percentage of all home refinance loans originated and purchased in the rated area．
    ＊＊＊Percentage of Families is based on the 2000 Census information．
    ＊＊＊＊As a percentage of loans with borrower income information available．No information was available for $5.2 \%$ of loans originated and purchased by bank．
    9 Data shown includes only One to Four－family and manufactured housing．（Property type of 1 or 2）

[^27]:    * Based on 2011 Peer Small Business Data -- US and PR
    ** Small loans to businesses originated and purchased in the MA/AA as a percentage of all small loans to businesses originated and purchased in the rated area.
    *** Businesses with revenues of $\$ 1$ million or less as a percentage of all businesses (Source D\&B - 2011).
    **** Small loans to businesses with revenues of $\$ 1$ million or less as a percentage of all loans reported as small loans to businesses. No information was available for $2.77 \%$ of small loans to businesses originated and purchased by the bank.

[^28]:    * Based on 2011 Peer Small Business Data -- US and PR
    ** Small loans to farms originated and purchased in the MA/AA as a percentage of all small loans to farms originated and purchased in the rated area.
    *** Farms with revenues of $\$ 1$ million or less as a percentage of all farms (Source D\&B - 2011).
    **** Small loans to farms with revenues of $\$ 1$ million or less as a percentage of all loans reported as small loans to farms. No information was available for $0.00 \%$ of small loans to farms originated and purchased by the bank.

[^29]:    * 'Prior Period Investments' means investments made in a previous period that are outstanding as of the examination date.
    ** 'Unfunded Commitments' means legally binding investment commitments that are tracked and recorded by the institution's financial reporting system.

[^30]:    * Loan Data as of December 31, 2011. Rated area refers to either state or multi-state MA rating area.
    ** The evaluation period for Community Development Loans is from November 3, 2009 through November 13, 2012.
    *** Deposit Data as of June 30, 2012. Rated Area refers to either the state, multi-state MA, or institution, as appropriate.

[^31]:    * Loan Data as of December 31, 2011. Rated area refers to either state or multi-state MA rating area
    ** The evaluation period for Optional Product Line(s) is from July 01, 2009 to December 31, 2011.
    *** Deposit Data as of June 30, 2012. Rated Area refers to either the state, multi-state MA, or institution, as appropriate.

[^32]:    * The evaluation period for Optional Product Line(s) is from July 01, 2009 to December 31, 2011.

[^33]:    Based on 2011 Peer Mortgage Data（USPR）
    ＊＊Home purchase loans originated and purchased in the MA／AA as a percentage of all home purchase loans originated and purchased in the rated area．
    ＊＊＊Percentage of Owner Occupied Units is the number of owner occupied units in a particular geography divided by the number of owner occupied housing units in the area based on
    2000 Census information
    ＊＊＊＊Data shown includes only One to Four－family and manufactured housing．（Property type of 1 or 2）

[^34]:    * Based on 2011 Peer Mortgage Data (USPR)
    ** Home improvement loans originated and purchased in the MA/AA as a percentage of all home improvement loans originated and purchased in the rated area.
    *** Percentage of Owner Occupied Units is the number of owner occupied units in a particular geography divided by the number of owner occupied housing units in the area based on 2000 Census information.
    **** Data shown includes only One to Four-family and manufactured housing. (Property type of 1 or 2)

[^35]:    * Based on 2011 Peer Mortgage Data (USPR)
    ** Home refinance loans originated and purchased in the MA/AA as a percentage of all home refinance loans originated and purchased in the rated area.
    *** Percentage of Owner Occupied Units is the number of owner occupied units in a particular geography divided by the number of owner occupied housing units in the area based on
    2000 Census information
    **** Data shown includes only One to Four-family and manufactured housing. (Property type of 1 or 2)

[^36]:    * Based on 2011 Peer Mortgage Data (USPR)
    ** Multi-family loans originated and purchased in the MA/AA as a percentage of all multi-family loans originated and purchased in the rated area.
    *** Percentage of Multi Family Units is the number of multi family units in a particular geography divided by the number of multifamily housing units in the area based on 2000 Census
    information.
    **** Multifamily loan distribution includes Home Purchases, Home Improvement and Refinances.

[^37]:    * Based on 2011 Peer Small Business Data -- US and PR
    ** Small loans to businesses originated and purchased in the MA/AA as a percentage of all small loans to businesses originated and purchased in the rated area.
    *** Source Data - Dun and Bradstreet (2011).

[^38]:    * Based on 2011 Peer Small Business Data -- US and PR
    ** Small loans to farms originated and purchased in the MA/AA as a percentage of all small loans to farms originated and purchased in the rated area.
    *** Source Data - Dun and Bradstreet (2011).

[^39]:    * Based on 2011 Peer Mortgage Data (USPR)
    ** Home purchase loans originated and purchased in the MA/AA as a percentage of all home purchase loans originated and purchased in the rated area.
    *** Percentage of Families is based on the 2000 Census information.
    **** As a percentage of loans with borrower income information available. No information was available for $6.8 \%$ of loans originated and purchased by bank.
    10 Data shown includes only One to Four-family and manufactured housing. (Property type of 1 or 2)

[^40]:    * Based on 2011 Peer Mortgage Data (USPR)
    ** Home improvement loans originated and purchased in the MA/AA as a percentage of all home improvement loans originated and purchased in the rated area.
    *** Percentage of Families is based on the 2000 Census information.
    **** As a percentage of loans with borrower income information available. No information was available for $3.4 \%$ of loans originated and purchased by bank
    11 Data shown includes only One to Four-family and manufactured housing. (Property type of 1 or 2)

[^41]:    ＊Based on 2011 Peer Mortgage Data（USPR）
    ＊＊Home refinance loans originated and purchased in the MA／AA as a percentage of all home refinance loans originated and purchased in the rated area．
    ＊＊＊Percentage of Families is based on the 2000 Census information．
    ＊＊＊＊As a percentage of loans with borrower income information available．No information was available for $4.7 \%$ of loans originated and purchased by bank．
    12 Data shown includes only One to Four－family and manufactured housing．（Property type of 1 or 2）

[^42]:    Based on 2011 Peer Small Business Data -- US and PR
    ** Small loans to businesses originated and purchased in the MA/AA as a percentage of all small loans to businesses originated and purchased in the rated area.
    *** Businesses with revenues of $\$ 1$ million or less as a percentage of all businesses (Source D\&B - 2011).
    $\star * * *$ Small loans to businesses with revenues of $\$ 1$ million or less as a percentage of all loans reported as small loans to businesses. No information was available for $1.67 \%$ of small loans to businesses originated and purchased by the bank.

[^43]:    Based on 2011 Peer Small Business Data -- US and PR
    ** Small loans to farms originated and purchased in the MA/AA as a percentage of all small loans to farms originated and purchased in the rated area.
    *** Farms with revenues of $\$ 1$ million or less as a percentage of all farms (Source D\&B - 2011).
    **** Small loans to farms with revenues of $\$ 1$ million or less as a percentage of all loans reported as small loans to farms. No information was available for $0.00 \%$ of small loans to farms originated and purchased by the bank.

[^44]:    * 'Prior Period Investments' means investments made in a previous period that are outstanding as of the examination date.
    ** 'Unfunded Commitments' means legally binding investment commitments that are tracked and recorded by the institution's financial reporting system.

