

## COMMUNITY REINVESTMENT ACT NOTICE

Under the Federal Community Reinvestment Act (CRA), the Comptroller of the Currency evaluates our record of helping to meet the credit needs of this community consistent with safe and sound operations. The Comptroller also takes this record into account when deciding on certain applications submitted by us.

Your involvement is encouraged.

You are entitled to certain information about our operations and our performance under the CRA, including, for example, information about our branches, such as their location and services provided at them: the public section of our most recent CRA Performance Evaluation, prepared by the comptroller; and comments received from the public relating to our performance in helping to meet community credit needs, as well as our responses to those comments. You may review this information today.

At least 30 days before the beginning of each quarter, the Comptroller publishes a nationwide list of the financial institutions that are scheduled for CRA examination in that quarter. This list is available from the MCBS Deputy Comptroller, Southeast Region, Office of the Comptroller of the Currency, 500 North Akard Street, Suite 1600, Dallas, TX 75201. You may send written comments about our performance in helping to meet community credit needs to Mike Stephens, CRA Officer, Huntington Federal Savings Bank, 1049 Fifth Avenue, Huntington, WV 25701 and MCBS Deputy Comptroller, Southeast Region, Office of the Comptroller of the Currency, 500 North Akard Street, Suite 1600. Dallas TX 75201. Your letter, together with any response by us, will be considered by the Comptroller in evaluating our CRA performance and may be made public.

You may ask to look at any comments received by the MCBS Deputy Comptroller. You may also request from the MCBS Deputy Comptroller an announcement of our applications covered by the CRA filed with the Comptroller

February 2, 2024

# **BOARD OF DIRECTORS ADOPTION STATEMENT OF THE COMMUNITY REINVESTMENT ACT OF HUNTINGTON FEDERAL SAVINGS BANK**

## **INTRODUCTION**

The Community Reinvestment Act (CRA) was implemented in 1977 following the congressional adoption of Title VIII of the Housing and Community Development Act of 1977. Its intent is to encourage all financial institutions to assess and meet the credit needs of their local communities, including low-to moderate-income areas, while maintaining their business strategies. CRA neither prohibits any activities nor requires specific allocation of credit.

The Board of Directors of Huntington Federal Savings Bank understands and recognizes its responsibilities regarding CRA. We feel that by remaining in this location and continuing to conduct business in a safe and sound manner, we have demonstrated our commitment to this community. In addition, we have adopted the following statement. To assert our dedication to the goals and spirit of the Community Reinvestment Act.

## **POLICY STATEMENT**

It is the policy of Huntington Federal Savings Bank to comply with the letter and intent of all applicable consumer and fair lending laws. No individual will be denied the services of our Bank due to discrimination because of race, color, religion, origin, sex, marital status, age, or location or age of dwelling. Employees are instructed to treat all people fairly and not to discourage any from applying for credit. Huntington Federal Savings Bank will accept and consider all written applications for credit and will grant such credit based on safe and sound banking principles. The intent of this policy is to involve all Board Members, Officers and employees and will be reviewed annually as to our involvement and participation.

Adopted by the Board of Directors April 11, 1995

## TABLE OF CONTENTS

---

- TAB 1.                   CRA PERFORMANCE EVALUATION
- TAB 2.                   BRANCHES  
SERVICES  
& ASSESSMENT AREAS
- TAB 3.                   HMDA DISCLOSURE STATEMENT
- TAB 4.                   LOAN TO DEPOSIT RATIOS
- TAB 5.                   COMPLAINTS

**TAB 1.**

**CRA PERFORMANCE**

**EVALUATION**



Office of the  
Comptroller of the Currency  
**Washington, DC 20219**

## **INTERMEDIATE SMALL BANK**

### **PUBLIC DISCLOSURE**

February 10, 2025

### **COMMUNITY REINVESTMENT ACT PERFORMANCE EVALUATION**

Huntington Federal Savings Bank  
**Charter Number: 700470**  
1049 5th Avenue Huntington,  
West Virginia 25701-2202

Office of the Comptroller of the Currency  
Roanoke Office  
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.

## Table of Contents

Overall CRA Rating .....	2
Description of Institution .....	3
Scope of the Evaluation .....	4
Discriminatory or Other Illegal Credit Practices Review .....	6
Multistate Metropolitan Statistical Area Rating .....	7
Huntington-Ashland, WV-KY-OH .....	7
Community Development Test. ....	12
Appendix A: Scope of Examination .....	A-1
Appendix B: Summary of MMS A and State Ratings .....	B-1
Appendix C: Definitions and Common Abbreviations .....	C-1
Appendix D: Tables of Performance Data .....	D-1

## **Table of Contents**

## Overall CRA Rating

**Institution's CRA Rating:** This institution is rated **Satisfactory**.

**The lending test is rated: Satisfactory.**

**The community development test is rated: Satisfactory.**

The major factors that support this rating include:

- The Lending Test rating is based on Huntington Federal Savings Bank's (HFSB or bank) record of performance in meeting the credit needs of the assessment area (AA) during the evaluation period through its lending activities.
- Considering the bank's size, financial condition, and credit needs of the AA, the bank's loan-to-deposit (LTD) ratio is reasonable.
- A substantial majority of the bank's loans are inside the banks AA.
- The overall geographic distribution of loans reflects reasonable dispersion in low- and moderate-income census tracts.
- The overall borrower distribution of loans by income level of the borrower reflects reasonable penetration of borrowers of different income levels.
- The Community Development (CD) Test rating is based on HFSB's record of performance in meeting the needs of the AA during the evaluation period through its community development activities.
- Overall, the institution exhibits reasonable responsiveness to the needs of its delineated AA through its community development activities.

### Loan-to-Deposit Ratio

Considering the bank's size, financial condition, and credit needs of the AA(s), the bank's LTD ratio is reasonable.

The bank's LTD ratio meets the standards for satisfactory performance. The bank's quarterly average LTD ratio is 58.31 percent, based off the twelve quarters from January 1, 2021, to December 31, 2023. This represents an increase from 50.04 percent at the previous CRA evaluation. The bank's quarterly average LTD ratios ranged from a high of 62.85 percent on September 30, 2023, to a low of 52.03 percent on March 31, 2021. This is below the quarterly average LTD ratio of 73.8 percent for local competitor banks in the AA during the same period. However, the difference is reasonable considering the bank's performance context. The LTD for competitor banks ranged from an average high of 81.79 percent to an average low of 62.17 percent over the same twelve-quarter period.

HFSB does not have similarly situated banks in the AA to which the OCC can compare performance. The bank's largest competitors in the Huntington-Ashland, WV-KY-OH MMSA (Huntington MMSA), and their respective average quarterly LTD ratios over the period were Putnam County Bank with 62.17 percent; Poca Valley Bank with 81.79 percent; Huntington National Bank with 77.13 percent; and City National Bank of West Virginia with 74.1 percent. These banks collectively hold 28.1 percent of the deposit market share in the Huntington MMSA.

These competitors have greater resources and lending limits and offer banking services that HFSB does not provide.

### Lending in Assessment Area

A substantial majority of the bank's loans are inside its AA.

The bank originated and purchased 96.5 percent of its total loans inside the bank's AAs during the evaluation period. This analysis is performed at the bank, rather than the AA, level. This percentage does not include extensions of credit by affiliates that may be considered under the other performance criteria. This performance was positively factored into the overall analysis of the geographic distribution of lending by income level of the census tract.

Lending Inside and Outside of the Assessment Area												
Loan Category	Number of Loans				Total #	Dollar Amount of Loans \$(000s)				Total \$(000s)		
	Inside		Outside			Inside		Outside				
	#	%	#	%		\$	%	\$	%			
Home Mortgage	839	96.5	30	3.5	869	144,028	95.2	7,313	4.8	151,341		
Total	839	96.5	30	3.5	869	144,028	95.2	7,313	4.8	151,341		

*Source: Bank Data; Due to rounding, totals may not equal 100 percent.*

### Description of Institution

Huntington Federal Savings Bank was established in 1929 as a federally chartered, mutual thrift institution headquartered in Huntington, West Virginia. As of December 31, 2023, HFSB had total assets of \$575 million. HFSB is an intrastate institution with five office locations, and five automated teller machines (ATMs) serving three counties in West Virginia (Cabell, Putnam, and Wayne) and fourteen census tracts in southern Lawrence County, Ohio. HFSB's main office and two branches are located in Cabell County with one additional branch each in Wayne and Putnam County.

The main office is located in a low-income census tract (CT) in Cabell County. The Barboursville Branch and the East Hills Branch are both located in Cabell County. The Barboursville Branch is located in a moderate-income CT, and the East Hills Branch is located in a middle-income CT. The Camden Road Branch is located in a moderate-income CT in Wayne County. The Teays Valley Branch is located in an upper-income CT in Putnam County. The bank has not opened any new branches or closed any existing branches since the previous CRA evaluation.

HFSB offers a variety of deposit and loan products to meet consumer, mortgage, and business banking needs. Banking services are standard, with the addition of 24-hour telephone banking, online banking and bill payments, and mobile banking. HFSB operates five full-service offices with traditional business hours. Each full-service office offers traditional deposit and loan products and services. Drive-up banking window facilities are available at the main office and three branches, and anytime ATM service is available at all locations. HFSB's website (<http://www.huntingtonfederal.com>) contains detailed information regarding products and services for both consumers and businesses, bank locations, and hours of operation.

The bank's main office lobby is open Monday through Thursday from 9:00 AM to 3:00 PM, Fridays from 9:00 AM to 5:00 PM, and is closed Saturday and Sunday. The main office drive-thru opens an hour before and stays open an hour after the lobby and opens on Saturdays from 8:00 AM to 3:00 PM. The hours of the other four branch lobbies are Monday through Thursday 9:00 AM to 4:00 PM, Fridays from 9:00 AM to 5:00 PM, and closed on Saturdays. The other branches' drive-thru hours are the same as the lobby and are open on Saturdays from 8:00 AM to 12:00 P.M.

HFSB's primary focus is on retail banking and attracts deposits from the public through their branch network. HFSB uses these funds for the origination of mortgage loans secured by 1-4 family residential real estate, and, to a lesser extent, mortgage loans secured by non-residential and multi-family real estate. The bank did not originate a material number of small farm or small business loans; therefore, these loan types were not evaluated.

As of December 31, 2023, tier I capital was \$91.5 million. HFSB's total deposits were \$446.5 million, or 77.8 percent of total assets. Total loans and leases were \$281.5 million, or 49 percent of total assets. 1-4 family residential loans make up 81.6 percent of total loans and leases, multi-family residential loans make up 8.9 percent, non-farm/non-residential loans make up 5 percent, commercial land and development loans make up 1.35 percent, and loans to individuals make up 0.67 percent of the total loan portfolio. The bank did not have any credit cards, automobile loans, or commercial and industrial loans.

The previous CRA evaluation was conducted on February 22, 2022, and received an overall rating of 'Satisfactory.' The bank does not have any legal, financial, or other factors that impede the bank's ability to meet the credit need in their AA during the current evaluation period.

## **Scope of the Evaluation**

### **Evaluation Period/Products Evaluated**

The OCC evaluated HFSB using the Intermediate Small Bank examination procedures, which includes a lending and a Community Development (CD) test. The lending test evaluates the institution's record of meeting the credit needs of its AA through its lending activities. The CD test evaluates the institution's responsiveness to CD needs in its AA through CD lending, services, and qualified investments. The evaluation period under the Lending Test and the CD Test covers the bank's performance from January 1, 2021, through December 31, 2023. As the bank's business strategy and lending products did not significantly change since the previous evaluation, The OCC concluded that this period was representative of the bank's performance.

The bank's primary loan product, based on originations during the evaluation period, is residential mortgages. HFSB originated 869 mortgage loans during the evaluation period. The OCC excluded business loans and small loans to farms because HFSB made a minimal number of these loans. Demographic information was extracted from the 2015 ACS U.S. Census data, 2020 U.S. Census data, and peer data was taken from the 2023 aggregate HMDA information for HMDA reporting financial institutions that reported lending activity within the AA.

## **Selection of Areas for Full-Scope Review**

In each state where the bank has an office, one or more of AAs within that state was selected for a full-scope review. For purposes of this evaluation, bank delineated AAs located within the same metropolitan statistical area (MSA), multistate metropolitan statistical area (MMSA), or combined statistical area (CSA) are combined and evaluated as a single AA. Similarly, bank delineated non-MSA AAs within the same state are combined and evaluated as a single area. These combined AAs may be evaluated as full- or limited-scope.

A full-scope review was completed for HFSB's one AA, which includes the counties of Cabell, Putnam, and Wayne in West Virginia, as well as 14 census tracts in Lawrence County, Ohio. The AA is located in the Huntington-Ashland, WV-KY-OH MMSA (25860).

## **Ratings**

The bank's overall rating is based on performance in the bank's one AA within the Huntington-Ashland, WV-KY-OH MMSA. Refer to the "Scope" section of the MMSA Rating section for details regarding how the areas were weighted in arriving at the respective ratings.

For analysis purposes, the OCC compared the bank's lending performance with demographic data from the 2015 American Community Survey (ACS) U.S. Census data and the 2021 Peer Mortgage Data for the analysis of 2021. The OCC compared the bank's lending performance with demographic data from the 2020 U.S. Census data and the 2023 HMDA Peer Mortgage Data for the analysis of 2022-2023. The OCC also utilized 2021, and 2022 Dun and Bradstreet (**D&B**) data.

There are two sets of data in Appendix D for the different census periods. No affiliate activity was included in this analysis. Refer to the table in Appendix A, Scope of the Examination, for more information on the scope of the review.

## **Discriminatory or Other Illegal Credit Practices Review**

Pursuant to 12 CFR 25.28(c) in determining a national bank's or federal savings association's (collectively, bank) CRA rating, the OCC considers evidence of discrimination or other illegal credit practices in any geography by the bank, or in any AA by an affiliate whose loans have been considered as part of the bank's lending performance. As part of this evaluation process, the OCC consults with other federal agencies with responsibility for compliance with the relevant laws and regulations, including the U.S. Department of Justice, the U.S. Department of Housing and Urban Development, and the Consumer Financial Protection Bureau, as applicable.

The OCC has not identified that this institution has engaged in discriminatory or other illegal credit practices that require consideration in this evaluation.

The OCC will consider any information that this institution engaged in discriminatory or other illegal credit practices, identified by, or provided to the OCC before the end of the institution's next performance evaluation in that subsequent evaluation, even if the information concerns activities that occurred during the evaluation period addressed in this performance evaluation.

## Multistate Metropolitan Statistical Area Rating

### Huntington-Ashland, WV-KY-OH MMSA

CRA rating for the Huntington-Ashland, WV-KY-OH MMSA<sup>1</sup>: Satisfactory.

The Lending Test is rated: Satisfactory.

The Community Development Test is rated: Satisfactory.

The major factors that support this rating include:

- The bank exhibits outstanding geographic distribution of loans in the MMSA.
- The bank exhibits reasonable distribution of loans to individuals of different income levels.
- Based on a full-scope review, the bank exhibits reasonable responsiveness to community development needs in the state through community development loans, qualified investments, and community development services, as appropriate, considering the bank's capacity and the need and availability of such opportunities for community development in the bank's AA.

### Description of Institution's Operations in Huntington MMSA

HFSB originated 839 loans by count and \$144.0 million by dollar volume in the AA during the evaluation period. This represented 96.5 percent by count and 95.2 percent by total dollar of total loans originated during the evaluation period. Competition for mortgage loans is strong and includes local commercial and savings banks, branches of larger regional and nationwide banks, and national lenders. Based on the most recent 2023 Peer Mortgage Data, there were 244 lending institutions within the AA competing for mortgage applications. HFSB ranked fifth place, with a market share of 3.71 percent by count and 4.9 percent by dollar amount. The top four lenders with a combined market share of 33.9 percent by count and 26.6 percent by dollar amount, are Vanderbilt Mortgage & Finance Inc., City National Bank of West Virginia, Movement Mortgage LLC, and Huntington National Bank.

A significant level of competition exists within the AA. Based on a review of the June 30, 2023, Federal Deposit Insurance Corporation (FDIC) Summary of Deposits Market Share Report, there are 68 offices, representing 19 FDIC-insured institutions within the AA competing for mortgage applications for Cabell, Putnam, and Wayne Counties, West Virginia and southern Lawrence County, Ohio. Refer to Appendix A: Scope of Examination for more details.

---

<sup>1</sup> This rating reflects performance within the MMSA. The staff's idle evaluations do not reflect performance in the parts of those states contained within the AAISAs.

**Table A – Demographic Information of the Assessment Area**  
**Assessment Area: Huntington MMSA 2021**

<b>Demographic Characteristics</b>	<b>#</b>	<b>Low % of #</b>	<b>Moderate % of #</b>	<b>Middle % of #</b>	<b>Upper % of #</b>	<b>NA* % of #</b>
Geographies (Census Tracts)	63	7.9	20.6	46.0	23.8	1.6
Population by Geography	245,169	4.8	14.3	54.1	25.7	1.1
Housing Units by Geography	111,509	6.2	15.0	53.5	24.8	0.5
Owner-Occupied Units by Geography	69,094	2.6	13.3	55.1	29.0	0.0
Occupied Rental Units by Geography	28,348	12.8	17.1	50.0	18.4	1.7
Vacant Units by Geography	14,067	10.9	19.3	52.0	17.2	0.5
Businesses by Geography	15,034	10.8	9.6	46.7	32.2	0.7
Farms by Geography	443	4.3	8.8	51.7	35.2	0.0
Family Distribution by Income Level	62,739	22.1	16.3	20.0	41.7	0.0
Household Distribution by Income Level	97,442	26.8	15.2	15.7	42.4	0.0
Median Family Income MMSA – 26580 Huntington-Ashland, WV-KY-OH	\$54,584	Median Housing Value			\$112,490	
		Median Gross Rent			\$647	
		Families Below Poverty Level			13.2%	

Source: 2015 ACS Census and 2021 D&amp;B Data

Due to rounding, totals may not equal 100.0

(\*) The NA category consists of geographies that have not been assigned an income classification.

**Table A – Demographic Information of the Assessment Area**  
**Assessment Area: Huntington MMSA AA – 2022-2023**

<b>Demographic Characteristics</b>	<b>#</b>	<b>Low % of #</b>	<b>Moderate % of #</b>	<b>Middle % of #</b>	<b>Upper % of #</b>	<b>NA* % of #</b>
Geographies (Census Tracts)	71	8.5	21.1	46.5	23.9	0.0
Population by Geography	238,392	5.0	16.6	52.9	25.5	0.0
Housing Units by Geography	112,239	5.5	18.2	51.6	24.6	0.0
Owner-Occupied Units by Geography	67,215	1.6	14.5	54.9	28.9	0.0
Occupied Rental Units by Geography	28,031	11.9	25.1	44.6	18.4	0.0
Vacant Units by Geography	16,993	10.1	21.6	50.5	17.8	0.0
Businesses by Geography	19,385	9.8	14.9	45.8	29.5	0.0
Farms by Geography	589	4.1	9.7	50.8	35.5	0.0
Family Distribution by Income Level	60,222	22.0	15.5	20.6	41.8	0.0
Household Distribution by Income Level	95,246	26.8	15.1	16.1	42.1	0.0
Median Family Income MSA – 26580 Huntington-Ashland, WV-KY-OH MMSA	\$61,976	Median Housing Value			\$129,377	
		Median Gross Rent			\$725	
		Families Below Poverty Level			12.7%	

Source: 2020 ACS Census and 2023 D&amp;B Data

Due to rounding, totals may not equal 100.0

(\*) The NA category consists of geographies that have not been assigned an income classification.

## **Demographic Data**

As of the 2015 ACS U.S. Census data shown above, the population of the Huntington MMSA was 245,169, with 4.8 percent in low-income CTs, 14.3 percent in moderate-income CTs, 54.1 percent in middle-income CTs, 25.7 percent in upper-income CTs, and 1.1 percent in CTs with no income data. As of the 2015 ACS U.S. Census, the AA consists of 63 CTs, five low-income CTs, 13 moderate-income CTs, 29 middle-income CTs, 15 upper-income CTs, and 1 CT listed as NA- no income data.

There were CT classification changes in the AA during the evaluation period between the 2015 ACS U.S. Census and the 2020 U.S. Census. As of the 2020 U.S. Census data in the table above, the population of the Huntington MMSA was 238,392, with 5.0 percent of the population living in low-income CTs, 16.6 percent in moderate-income CTs, 52.9 percent in middle-income CTs, and 25.5 percent in upper-income CTs. As of the 2020 U.S. Census data, the AA consists of 71 CTs, comprised of six low-income CTs, 15 moderate-income CTs, 33 middle-income CTs, and 17 upper income CTs, with no CTs with an unassigned income classification.

## **Employment/Economic Factors**

According to the Bureau of Labor Statistics, the non-seasonally adjusted unemployment rates for Cabell, Putnam, and Wayne counties in West Virginia were 3.7 percent, 3.3 percent, and 4.1 percent, respectively, as of December 31, 2023. The unemployment rate for the state of West Virginia was 3.9 percent. The unemployment rate for Lawrence County, Ohio, was 4.1 percent, which was above the state unemployment rate in Ohio of 3.7 percent. The national unemployment rate was 3.8 percent. The unemployment rates spiked in 2020 due to the COVID-19 pandemic and were declined slightly through 2021, leading to slightly lower unemployment rates in 2022, and 2023.

According to Moody's Analytics, as of August 2024, the Huntington MMSA experienced a drop in employment due to losses in transportation/warehousing and professional/business services sectors. According to Moody, weak demographics will cause Huntington MMSA to be one step behind the nation in the long run. Huntington MMSA's top industries include education and health services, retail trade, manufacturing, and leisure and hospitality. Top employers include King's Daughters Medical Center, Cabell-Huntington Hospital, Saint Mary's Medical Center, Marshall University, and Marathon Petroleum. Huntington MMSA continues to experience a declining population and rising costs of housing. Declining population will lead to fewer residents spending locally, which will lead to lower available hiring in leisure/hospitality, retail, and personal services, and limiting demand for residential construction.

## **Housing**

According to the 2015 ACS U.S. Census data, the median housing value in the Huntington MMSA was \$112,490. The median family income (MF!) was \$54,584 annually, which translates to moderate-income families' MF! of \$32,750 to \$43,667 annually. The median housing values are 3.4 times the lower-end of annual income for moderate-income families. The cost of housing may create a significant financial barrier to homeownership among moderate-income families. The

2015 ACS U.S. Census data shows that there are 111,509 total housing units in the Huntington MMSA, of which 62.0 percent are owner-occupied, 25.4 percent are rental-occupied, and 12.6 percent are vacant units. Only 11 percent of vacant units are available in low-income geographies and only 19 percent are in moderate-income geographies. Additionally, renter occupied units in low-income geographies total 12.8 percent while owner-occupied units make up 2.6 percent within low-income geographies. According to Moody's Analytics, as of August 2024, the median housing year-built was 1969. The cost of homeownership in older housing stock is typically higher than in newer housing. The median age of housing is also a significant barrier to mortgage lending in those geographies.

According to the 2020 U.S. Census data, the median housing value was \$129,377. The median family income (MFI) was \$61,976 annually, which translates to a moderate-income families' MFI of \$37,186 to \$49,581. The median housing values are 3.5 times the lower-end of annual income for moderate-income families. Thus, the cost of housing may create a significant financial barrier to homeownership among low- and moderate-income families. The 2020 U.S. Census data shows there are 112,239 available housing units in the Huntington MMSA, of which 59.9 percent are owner-occupied, 25.0 percent in occupied rental properties, and 15.1 percent are vacant. Only 10.1 percent of vacant homes are in low-income geographies and 21.6 percent are in moderate-income geographies. Additionally, renter occupied units in low-income geographies total 11.9 percent while owner-occupied units total 1.6 percent in low-income geographies.

### **Community Contact**

A representative of the OCC performed a community contact with a local community service organization for an assessment of the local market area, and the community development needs, specifically targeted at low- and moderate-income families and at-risk community. The community contact was a non-profit organization that promotes and advances youth development, healthy living, and social responsibility of people in the Huntington area. The organization serves Cabell County in West Virginia. The contact indicated that there are opportunities in the area for banks to participate in community development through youth service-related projects and youth sporting events within the organization. The contact stated that the local financial institutions in the AA are responsive in meeting the community's credit and sponsorship needs.

### **Scope of Evaluation in Huntington MMSA**

The rating for the Huntington MMSA is based on the full-scope review of the Huntington-Ashland, WV-KY-OH MMSA AA. HFSB's branches and ATMs are located within the AA, and a significant portion of the bank's lending and CD activities are centered within the AA. Home mortgages are the bank's primary lending product and were evaluated under the Lending Test. As discussed above, the OCC used HMDA loan data for 2021, 2022, and 2023, for the lending analysis. The OCC reviewed CD loans, qualified investments, and CD services for 2021, 2022, and 2023, for the CD test. Refer to the "Scope of the Evaluation" section for additional information.

## **CONCLUSIONS WITH RESPECT TO PERFORMANCE TESTS IN HUNTINGTON-ASHLAND, WV-KY-OH MMSA AA**

HFSB's performance test conclusion is based on the full-scope review of the bank's AA.

### **LENDING TEST**

The bank's performance under the Lending Test in the Huntington-Ashland, WV-KY-OH MMSA AA is rated Satisfactory.

#### **Conclusions Areas Receiving Full-Scope Reviews**

Based on a full-scope review, the bank's performance in the Huntington-Ashland, WV-KY-OH MMSA AA is reasonable. The LTD is reasonable and a substantial majority of loans were originated inside the bank's AA. The record of lending to borrowers of different income levels reflects reasonable distribution in the AA. The geographic distribution of loans reflects reasonable distribution in the AA.

HFSB originated a minimal number of small business, small farm, and consumer loans during the evaluation period; therefore, analysis of loans for these product types is not meaningful and has been omitted from the Public Evaluation.

#### **Distribution of Loans by Income Level of the Geography**

The bank exhibits excellent geographic distribution of loans in the MMSA.

##### ***Home Mortgage Loans***

Refer to Table O in the "MMSA" 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.

The analysis reflects lending in most tracts and is in line with peer lending. The OCC compared the bank's lending in low- and moderate-income CTs to aggregate HMDA loans in those CTs, as well as to the percent of owner-occupied housing units (OOHUs) in each income tract category. LMI geographies consist of a large number of rental and vacant units and have a lower volume of OOHUs.

In 2021, the percent of loans originated in the low-income CTs exceeds the low-income aggregate peer lending data percentage and the percentage of OOHUs. The small number of low-income CTs in the AA generates few lending opportunities as evidenced by the low aggregate lending percentages. The level of lending in moderate-income CTs exceeds aggregate peer lending data percentage and is within a reasonable range below the OOHU distribution, despite economic constraints in the AA and a large number of rental units.

In 2022 and 2023, the percentage of loans originated in the low-income and moderate-income CTs exceeds the low-income and moderate-income aggregate peer lending data percentage and the percentage of OOHUs.

### ***Lending Clip Analysis***

The OCC reviewed summary reports and maps detailing HFSB's lending activity over the evaluation period for home mortgage loans to identify any gaps in the geographic distribution of loans. No unexplained conspicuous gaps were identified.

### **Distribution of Loans by Income Level of the Borrower**

The bank exhibits a reasonable distribution of loans to individuals of different income levels, given the product lines offered by the bank.

#### ***Home Mortgage Loans***

Refer to Table P in the "MMSA" 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 OCC compared the bank's level of lending to the percentage of families by income level category and to the percent of aggregate HMDA reportable loans.

In 2021, lending to low- and moderate-income families is well below the percentage of families in the AA, as well as the aggregate HMDA Peer Group lending.

In 2022 and 2023, lending to low-income families was significantly below the percentage of low-income families and was slightly below the aggregate HMDA Peer Group lending. Lending to moderate-income families was significantly below the percentage of moderate-income families and was below the aggregate HMDA Peer Group lending.

The OCC considered other factors in the bank's performance during the evaluation period, including the cost of homeownership, the percentage of families living below the poverty line, and competition for home mortgage lending in Huntington MMSA as an obstacle to homeownership for low- and moderate-income borrowers. Refer to the "*Description of Institution's Operations*" section of this performance evaluation for more information.

#### **Responses to Complaints**

There were no CRA complaints received by the bank or the agency since the previous examination regarding performance in meeting the credit needs of the bank's AA.

### **COMMUNITY DEVELOPMENT TEST**

The bank's performance under the Community Development Test in the Huntington MMSA is rated Satisfactorily

Based on a full-scope review, the bank exhibits reasonable responsiveness to community development needs in the MMSA through community development loans, qualified investments, and community development services, as appropriate, considering the bank's capacity and the need and availability of such opportunities for community development in the bank's AA.

**Cabell-Putnam-Wayne Counties WV and Southern Lawrence County OH AA in Huntington-Ashland, WV-KY-OH 25680 MMSA**

**Number and Amount of Community Development Loans**

Refer to the Community Development Loan table below for the facts and data used to evaluate the bank's level of CD lending. The table includes all CD loans, including multifamily loans that also qualify as CD loans.

Community Development Loans Table A				
Assessment Area	Total			
	#	% of Total#	S(000's)	% of Total S
Huntington-Ashland WV-KY-OH MMSA	9	100%	5.647,475	100%
TOTAL	9	!00%,	5.647,475	100%

HFSB continues to maintain a longstanding partnership with a housing consortium program. This program targets LMI first time homebuyers. Funds may be used for down payment and closing cost assistance for qualified homebuyers to purchase an owner-occupied, single-family residence. HFSB provides the first mortgage loan, utilizing flexible underwriting criteria. During the review period, HFSB granted six loans with a total amount of \$397,475 thousand under this program. The bank originated the following three loans for the total amount of \$5.25 million in the broader statewide or regional area that has a purpose, mandate, or function to directly benefit the MMSA.

This community service organization is located within the Huntington MMSA.

- A \$2.025 million loan to an economic development authority to construct a warehouse distribution plant. This warehouse project was intended to bring employment opportunities into the Cabell County area.
- A \$2.725 million loan to an economic development authority to construct a warehouse distribution plant. This warehouse project was intended to bring employment opportunities in the Cabell County area.
- A \$500 thousand loan to a community organization, the loan proceeds were used in the renovation and expansion of administrative offices to support economic development in the area.

## Number and Amount of Qualified Investments

Assessment Area	Qualified Investments									
	Prior Period*		Current Period		Total				Unfunded Commitments**	
	#	\$(000's)	#	\$(000's)	#	% of Total #	\$(000's)	% of Total \$	#	\$(000's)
Huntington-Ashland WV-OH-KY-MMSA	0	0	17	533	17	62.9%	533	17.8%	0	0
Outside AA	4	992	10	2,448	10	37.1%	2,448	82.2%	0	0
Total	4	992	27	2,988	27	100 %	2,988	100 %	0	0

\* Prior Period Investments means investments made in a previous evaluation 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.

The Qualified Investment Table, shown above, set forth the information and data used to evaluate the bank's level of qualified CD investments. These tables include all CD investment, including prior period investments that remain outstanding as of the examination date.

HFSB provided \$532,881 in grants and donations to community service organizations in the bank's AA. The significant dollar amounts were given to the following organizations for the purpose of providing affordable housing and/or services to low- and moderate-income families and support economic development and revitalization/stabilization in the bank's AA. The following are some of the donations/grants made in the review period:

- A grant for \$90,000 to support a non-profit organization meeting the physical needs of the homeless or those at risk of being homeless and providing cold weather shelter in the AA.
- A grant of \$60,000 to community partner that educates, advocates, empowers, and enacts change by providing lifesaving services to those affected by domestic violence and human trafficking.
- A grant of \$9,000 to a non-profit organization to provided new bedding for the homeless.
- A grant for \$33,000 to community partner that sponsors Central West Virginia's programs to provide direct services in response to the identified needs in the community.
- A \$7,500 grant to support eviction prevention and homelessness diversion programs.

### Outside the AA

During the evaluation period of January 1, 2021, to December 31, 2023, the bank purchased 10 certificates of deposit (CDs), totaling \$2,456,000 million, with financial institutions in low-income designated areas and two designated as minority serving for LMI families. These CD investments qualify for CRA credit as such activities need not also benefit the bank's AA or the broader statewide or regional area(s) that includes the bank's AA, according to 12 CFR 25.21(f).

### **Extent to Which the Bank Provides Community Development Services**

During the evaluation period, bank employees provided financial and technical expertise and leadership services to qualifying community organizations. Listed below are community development services provided by HFSB employees.

- A bank officer provided financial and operational expertise through membership in community service organizations that provide child welfare services, temporary housing assistance to LMI families, and promotes economic development in the Huntington area.
- A bank officer provided 20 hours per year of financial and operational expertise as a board member on a community service organization that provides mentorship to at-risk children of LMI families. This bank officer also organized and assisted with fond raising programs, including soliciting, and arranging investments for the organization.
- A bank employee volunteered to help an organization with annual fundraising to support the community outreach in LMI communities.
- A bank officer provided 16 hours of financial expertise as a board member on community service organizations that provide food, clothing, and temporary housing assistance to **LMI** families in the Huntington area and promote economic development in the AA.

## 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 MSA(s), MMSA(s), and non-MSA(s) 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".

<b>Time Period Reviewed:</b>	<b>01/01/2021 to 12/31/2023</b>	
<b>Bank Products Reviewed:</b>	<b>Home mortgage loans</b> <b>Community development loans, qualified investments, and community development services</b>	
<b>Affiliate(s)</b>	<b>Affiliate Relationship</b>	<b>Products Reviewed</b>
<b>None</b>	Not applicable	Not applicable

### List of Assessment Areas and Type of Examination

<b>Rating and Assessment Areas</b>	<b>Type of Exam</b>	<b>Other Information</b>
<b>MMSA(s)</b>		
<b>Huntington-Ashland, WV-KY-OH MMSA 26580</b>	<b>Full-scope</b>	The entire counties of Cabell, Putnam, and Wayne in the state of West Virginia. 14 whole census tracts in Lawrence County, Ohio that are adjacent to the counties in West Virginia – 501, 502,503;504;505;508,509;510.1;510.2;511; 512; 513;514.01;514.02

## Appendix B: Summary of MMSA

---

RATINGS: HUNTINGTON FEDERAL SAVINGS BANK			
Overall Bank:	Lending Test Rating*	CD Test Rating	Overall Bank/Multistate Rating
<b>Huntington Federal Savings Bank</b>	Satisfactory	Satisfactory	Satisfactory
<b>MMSA:</b>			
<b>Huntington-Ashland, WV-KY-OH MMSA</b>	Satisfactory	Satisfactory	Satisfactory

(\*) The Lending Test and Community Development Test carry equal weight in the overall rating.

## Appendix C: Definitions and Common Abbreviations

---

The following terms and abbreviations are used in 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. For example, a bank subsidiary is controlled by the bank and is, therefore, an affiliate.

**Aggregate Lending (Aggt.):** The number of loans originated and purchased by all reporting lenders (HMDA or CRA) in specified income categories as a percentage of the aggregate number of loans originated and purchased by all reporting lenders in the state/assessment area.

**Census Tract (CT):** A small, relatively permanent statistical subdivision of a county delineated by a local committee of census data users for the purpose of presenting data. Census tracts nest within counties, and their boundaries normally follow visible features, but may follow legal geography boundaries and other non-visible features in some instances. Census tracts ideally contain about 4,000 people and 1,600 housing units.

**Combined Statistical Area (CSA):** A geographic entity consisting of two or more adjacent Core Based Statistical Areas with employment interchange measures of at least 15. An employment interchange measure is a measure of ties between two adjacent entities. The employment interchange measure is the sum of the percentage of workers living in the smaller entity who work in the larger entity and the percentage of employment in the smaller entity that is accounted for by workers who reside in the larger entity.

**Community Development (CD):** 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 Small Business Administration Development Company or Small Business Investment Company programs size eligibility standards or have gross annual revenues of \$ 1 million or less; or activities that revitalize or stabilize low- or moderate-income geographies, distressed or underserved nonmetropolitan middle-income geographies, or designated disaster areas.

**Community Reinvestment Act (CRA):** The statute that requires the OCC to evaluate a bank's record of meeting the credit needs of its entire community, including LMI areas, 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, other secured consumer loans, and other unsecured consumer loans.

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

**Full-Scope Review:** Performance under the Lending, Investment, and Service Tests is analyzed considering performance context, quantitative factors (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 census.

**Home Mortgage Disclosure Act (HMDA):** The statute that requires certain mortgage lenders that conduct 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 applicants, the amount of loan requested, the disposition of the application (e.g., approved, denied, and withdrawn), the lien status of the collateral, any requests for preapproval, and loans for manufactured housing.

**Home Mortgage Loans:** A closed-end mortgage loan or an open-end line of credit as these terms are defined under 12 CFR 1003.2, and that is not an excluded transaction under 12 CFR 1003.3(c)(1) through (c)(10) and (c)(13).

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

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

**Low-Income Individual:** Individual income that is less than 50 percent of the area median income.

**Low Income Geography:** A census tract with a median family income that is less than 50 percent.

**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 state/assessment area.

**Median Family Income (MFI):** The median income determined by the U.S. Census Bureau every five years and used to determine the income level category of geographies. The median is the point at which half of the families have income above, and half below, a range of incomes. Also, the median income determined by the Federal Financial Institutions Examination Council (FFIEC) 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, and half below, a range of incomes.

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

**Metropolitan Statistical Area:** An area, defined by the Office of Management and Budget, as a core based statistical area associated with at least one urbanized area that has a population of at least 50,000. The Metropolitan Statistical Area comprises the central county or counties containing the core, plus adjacent outlying counties having a high degree of social and economic integration with the central county, or counties 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.

**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.

**Rating Area:** A rated area is a state or multi-state metropolitan statistical 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 statistical area, the institution will receive a rating for the multi-state metropolitan statistical area.

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

**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 1 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.

## Appendix D: Tables of Performance Data

---

### Content of Standardized Tables

A separate set of tables is provided for each state. All multistate metropolitan statistical areas, if applicable, 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 are treated as originations; and (2) "aggregate" is the percentage of the aggregate number of reportable loans originated and purchased by all HMDA or CRA-reporting lenders in the MMSA/assessment area. Deposit data are compiled by the FDIC and are available as of June 30<sup>th</sup> 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 0. Assessment Area Distribution of Home Mortgage Loans by Income Category of Geography** - 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 aggregate peer data for the years the data is available.

**Table P. Assessment Area Distribution of Home Mortgage Loans by Income Category of the Borrower** - 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 MMSA/assessment area. The table also presents aggregate peer data for the years the data is available.

The total loan amount presented in the tables for each assessment area may differ from the total loan amount reported in the aggregate table due to how the underlying loan data is rounded in each table.

**Table O: Assessment Area Distribution of Home Mortgage Loans by Income Category of the Geography**

Assessment Area:	Total Home Mortgage Loans				Low-Income Tracts			Moderate-Income Tracts			Middle-Income Tracts			Upper-Income	
	#	\$	Overall Market	% of Total	% of OOHUs	% Bank Loans	Aggregate	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate	% of Owner-Occupied Housing Units	% Bank Loan
Huntington MMSA 2021	375	57,683,710	100.0	7,183	2.6	4.5	1.6	13.3	9.1	6.9	55.1	55.7	54.0	29.0	29.6
<b>Total</b>	<b>375</b>	<b>57,683,710</b>	<b>100.0</b>	<b>7,183</b>	<b>2.6</b>	<b>4.5</b>	<b>1.6</b>	<b>13.3</b>	<b>9.1</b>	<b>6.9</b>	<b>55.1</b>	<b>55.7</b>	<b>54.0</b>	<b>29.0</b>	<b>29.6</b>

Source: 2015 U.S. Census; 01/01/2021 – 12/31/2021 Bank Data, "2021 HMDA Aggregate Data. "--" data not available.

Due to rounding, totals may not equal 100.0%

**Table O: Assessment Area Distribution of Home Mortgage Loans by Income Category of the Geography**

Assessment Area:	Total Home Mortgage Loans				Low-Income Tracts			Moderate-Income Tracts			Middle-Income Tracts			Upper-Income	
	#	\$	Overall Market	% of Total	% of OOHUs	% Bank Loans	Aggregate	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate	% of Owner-Occupied Housing Units	% Bank Loan
Huntington MMSA 2023	464	86,343,897	100.0	3,800	1.7	4.5	1.8	14.5	14.7	12.8	54.9	53.2	53.2	28.9	27.6
<b>Total</b>	<b>464</b>	<b>86,343,897</b>	<b>100.0</b>	<b>3,800</b>	<b>1.7</b>	<b>4.5</b>	<b>1.8</b>	<b>14.5</b>	<b>14.7</b>	<b>12.8</b>	<b>54.9</b>	<b>53.2</b>	<b>53.2</b>	<b>28.9</b>	<b>27.6</b>

Source: 2020 U.S. Census; 01/01/2022 - 12/31/2023 Bank Data, 2023 HMDA Aggregate Data. "--" data not available.

Due to rounding, totals may not equal 100.0%

The total loan amount presented in the tables for each assessment area may differ from the total loan amount responded in the aggregate total rounded in each table.

## Appendix D-2

Table P: Assessment Area Distribution of Home Mortgage Loans by Income Category of the Borrower															
	Total Home Mortgage Loans				Low-Income Borrowers			Moderate-Income Borrowers			Middle-Income Borrowers			Upper-Income I	
Assessment Area:	#	\$	% of Total	Overall Market	% of Families	% Bank Loans	Aggregate	% of Families	% Bank Loans	Aggregate	% of Families	% Bank Loans	Aggregate	% of Families	% Ban Loa
Huntington MMSA 2021	375	57,363,711	100.0	7,183	22.1	4.8	5.4	16.3	11.7	14.6	20.0	20.0	20.7	41.7	49.1
<b>Total</b>	<b>375</b>	<b>57,363,711</b>	<b>100.0</b>	<b>7,183</b>	<b>22.1</b>	<b>4.8</b>	<b>5.4</b>	<b>16.3</b>	<b>11.7</b>	<b>14.6</b>	<b>20.0</b>	<b>20.0</b>	<b>20.7</b>	<b>41.7</b>	<b>49.1</b>

Source: 2015 ACS ; 01/01/2021 - 12/31/2021 Bank Data, 2021 HMDA Aggregate Data, "--" data not available.  
Due to rounding, totals may not equal 100.0%

Table P: Assessment Area Distribution of Home Mortgage Loans by Income Category of the Borrower															
	Total Home Mortgage Loans				Low-Income Borrowers			Moderate-Income Borrowers			Middle-Income Borrowers			Upper-Income I	
Assessment Area:	#	\$	% of Total	Overall Market	% of Families	% Bank Loans	Aggregate	% of Families	% Bank Loans	Aggregate	% of Families	% Bank Loans	Aggregate	% of Families	% Ban Loa
Huntington MMSA 2023	464	86,343,897	100.0	3,800	22.0	5.0	8.0	15.5	9.9	20.6	20.6	23.1	22.4	41.8	46..
<b>Total</b>	<b>464</b>	<b>86,343,897</b>	<b>100.0</b>	<b>3,800</b>	<b>22.0</b>	<b>5.0</b>	<b>8.0</b>	<b>15.5</b>	<b>9.9</b>	<b>20.6</b>	<b>20.6</b>	<b>23.1</b>	<b>22.4</b>	<b>41.8</b>	<b>46..</b>

Source: 2020 U.S. Census ; 01/01/2022 - 12/31/2023 Bank Data, 2023 HMDA Aggregate Data, "--" data not available.  
Due to rounding, totals may not equal 100.0%

The total loan amount presented in the tables for each assessment area may differ from the total loan amount responded in the aggregate total rounded in each table.

### Appendix D-3

TAB 2.

BRANCHES, SERVICES  
& ASSESSMENT AREAS

## **HUNTINGTON FEDERAL SAVINGS BANK CRA STATEMENT**

### **PURPOSE OF CRA**

The Community Reinvestment Act became law in 1977 (CRA). Its purpose is to encourage financial institutions to meet the needs of their individual communities in terms of community development and credit availability for low- and moderate-income consumers and small or minority businesses. In light of the significant developments that have occurred in the financial institutions industry since enactment of the CRA, the Board of Governors of the Federal Reserve System, the Federal Deposit Insurance Corporation, the Office of the Comptroller of the Currency (OCC) (the Agencies) have issued a joint statement to assure that the requirements and purpose of the CRA are met. This published joint statement defines the purpose of the CRA which is to ensure that strategic and business plans do not ignore the needs of low to moderate income consumers in our community.

The community delineation, assessment of community needs, outreach and marketing efforts, and products and services are all critical in terms of the CRA rating. Huntington Federal maintains a CRA file, which documents our community involvement. This program file is evidence of our continued commitment to this area and what we believe to be an effective CRA effort.

### **OVERVIEW OF HUNTINGTON FEDERAL SAVINGS BANK**

Huntington Federal Savings Bank is a 540 million mutual institution founded in 1934 and has operated at its current location since 1959. The home office is located at:

1049 Fifth Avenue, Huntington, WV 25701

Census Tract # 0007.00 Low Income

We also operate four branches at:

3903 Teays Valley Road, Hurricane, WV 25526

Census Tract# 0206.04 Upper Income

East Hills Mall 3248 Rt. 60 East, Huntington, WV 25705

Census Tract# 0102.02 Middle Income

Westmoreland 500 Camden Road, Huntington, WV 25704

Census Tract# 0052.00 Moderate Income

3413 US Rt. 60 East, Huntington, WV 25504

Census Tract# 0104.00 Middle Income

These communities are also served with four Automated Teller Machines for our customers continued convenience and are members of the Accel Exchange Network. We are committed to serving this area.

## **COMMUNITY ASSESSMENT AREA**

Huntington Federal Savings Bank defines its assessment area as Putnam, Wayne and Cabell counties in West Virginia and the southern portion of Lawrence County, Ohio. This area consists of both urban and rural communities. The economic composition is diverse, from small sole-proprietorships to large heavy-industry corporations. The Bank may have a small number of customers outside this assessment area due to their own personal preference and their willingness to travel a longer distance in order to do business with Huntington Federal. For purposes of demographic data, these customers are not included in our analysis of the community we serve.

## **CREDIT SERVICES OFFERED**

Huntington Federal has a long history in being an active member of the community we serve. Seventy-five years ago we began granting loans for homeownership. Over the years we have expanded our services to include loans that reach into the business and civic activities of our community. Our goal in lending is to first serve our local borrowers. However, supply and demand do not always match on the local level. It is therefore necessary that we occasionally grant loans outside our nominal lending area. Huntington Federal has been, and remains, primarily a mortgage lender. We grant commercial business loans on a very limited basis. Particularly when those loans will generate or maintain economic benefits to our community. We also provide commercial real estate loans as part of our local economic involvement. Both of these loan types help keep and/or attract employment and growth. We will also consider land development loans, both for commercial and residential projects. Over the years, we have been very active in lending to religious organizations. Church loans continue to be an important part of our loan portfolio. Residential lending is the pivot of our credit services. Our primary goal is to help satisfy the housing needs of our Community. We accomplish this by offering a variety of home loan products, particularly, our one to

four family loans. We also participate in multi-family loans, such as rental units, townhouses, and condominiums. For customers wishing to purchase a future home site, we grant undeveloped lot loans. We maintain a department that is devoted entirely to the processing of our construction loans. We will consider and participate in any community housing projects, in particular if those projects comply with and are within the intent of the Federal Home Loan Bank's Affordable Housing Program and/or Community Investment Funds.

Our installment loan program offers a variety of credit services tailored to the needs of both the individual and the family. This program includes - Consumer loans for personal or household use secured by a lien on real estate and share loans by which customers may use their savings as collateral.

## **DEPOSIT SERVICES**

Since being chartered in 1934, Huntington Federal has paid 473 million in dividends to our depositors. We are dedicated to the safety of these funds placed in our trust. We offer savings accounts for the small and large investor, as well as certificates of deposit from three months up to five years. We have a variety of checking accounts for personal or business use. Our Christmas Club account is a popular way of saving for the holidays, and IRA's (individual retirement accounts) have continued to grow over the years.

## **MISCELLANEOUS SERVICES**

Debit card service (Fiserv EIT)

Credit card service (Agent for Visa only) Certified

Checks

Safe Deposit Boxes After hour depository Bank by Mail

Health Savings  
Accounts On-Line  
Banking  
Sweep Overdraft Protection  
Electronic Statement\_Deliverly  
Internet Bill Payment Automated  
Loan Payment

**SPECIALIZED SERVICES**

Checking for senior citizens  
Low-cost checking to religious organizations  
Direct deposit of pension and Social Security Checks

## HUNTINGTON FEDERAL SAVINGS BANK LOAN PRODUCT - SERVICE & FEE COST

Service and fee cost will vary depending on loan product, amount of loan and the county your loan closing takes place. An average range of cost estimates would be between \$1000 to \$3,500

### HUNTINGTON FEDERAL SAVINGS BANK SCHEDULE OF CHARGES FOR SERVICES

	<u>FEE</u>
ACH Unauthorized Return Fee	7.00
ATM and Visa Debit Card Replacement & Personalized	10.00
ATM and Visa Debit Card Expedite Replacement Fee	70.00
ATM and Visa Debit Hot Card Fee	10.00
ATM and Visa Debit Out-Of-Network Trans (each)	2.00
Certified Check	7.00
Check Copy	6.00
Check Printing Charge	Varies
Checks (limit 10 temporaries per month) (each)	0.25
Collection Draft	10.00
Deposited Returned Item	10.00
Exchange Check	5.00
Fax Usage	5.00
FHLB - Late Return Adjustment Fee	10.00
Legal Process (IRS and/or State Levies)	25.00
Legal Process (Suggestions)	25.00
Locked Money Bag	20.00
Money Order	5.00
NSF - Checks, ACH, and Reoccurring ATM & Visa Debit	35.00
NSF - Representation of previous NSF	35.00
Photocopy for Customer	1.00

Reg D Excessive Transactions on Statement Savings and Money Master Accounts are limited to 6 per statement. After the limit a \$2.00 fee will be implemented per overage

Request for Audited Financial Statements (each)	30.00
Research Request per hour (1/2 hour minimum)	30.00
Statement Copy Current Month	N/A
Statement Copy of Additional Months(each)	5.00
Statement Reconciliation Current Month	N/A
Statement Reconciliation Prior Months (each)	10.00
Stop Payment - All	35.00
Sweep Transaction from Savings or Checking	5.00
Telephone Transfer	4.00
Wire Transfer Domestic Incoming or Outgoing	30.00
Wire Transfer Foreign	50.00

Safety Deposit Box Annual Rental Fees:

10 X 10 =	\$75.00 + sales tax
5 X 10 =	\$50.00 + sales tax
5 X 5 =	30.00 + sales tax
3 X 10 =	\$35.00 + sales tax
3 X 5 =	\$25.00 + sales tax
Safety Deposit Box Drilling Fee	\$175.00
Safety Deposit Box Lost Key Replacement	\$35.00

**Checking Types and Monthly Statement Charge:**

(84) E-Master Checking First 5 checks cleared	N/A
(84) Each Check Clearing after 5 Checks (each)	.15
(84) E-Master Checking no email address	3.00
(96) Master Checking	3.00
(97) Super Paymaster Checking below \$2,500	5.00
(98) Money Market Checking (MMDA) below \$300	5.00
(99) Paymaster Checking below \$500	5.00
(91) Health Savings Checking below \$500	5.00
Health Savings Account Annual Maintenance Fee	10.00

See a Customer Service Representative for information on the following:

(95) Business/Commercial Checking below \$2,500	25.00
---	-------

**Savings and Checking Dormant Fees - See TIS disclosure**

Effective: January 02, 2024



## Customer Notice of Branch Closing

April 28, 2021

Dear Huntington Federal Customer,

At 6:00PM on July 27, 2021, our Putnam Village Branch Office, located at 1/u Putnam Village Drive, Teays, WV 25560 will close. All accounts currently maintained at this branch will be transferred to our new Teays Valley Branch Office, located at 3903 Teays Valley Road, Hurricane, WV 25526. Your accounts will be transferred automatically to the branch. No action by you will be necessary.

The new location will have an in-office mortgage loan originator, safe deposit boxes, and offer better access to the facility with more parking. The new office will observe the following hours of operation:

### LOBBY HOURS

Monday-Thursday:	9am to 4pm
Friday:	9am to 6pm
Saturday:	Closed

### DRIVE-IN HOURS

Monday-Thursday:	9am to 4pm
Friday:	9am to 6pm
Saturday:	8am to 12Noon

**Any person wishing to comment on this proposed branch closing may file comments with the Office of the Comptroller of the Currency. Roanoke Field Office, 4419 Pheasant Ridge Road, 3<sup>rd</sup> Floor, Suite 300, Roanoke, VA 24014. Comments should be received by the proposed closing date.**

If you have any questions, call us at 304-757-8209. We look forward to serving your banking needs for years to come.

Sincerely,

Matthew M. Wagner

Matthew M. Wagner  
President & CEO



## Customer Notice of Branch Relocation

September 13, 2021

**Huntington Federal Customer,**

At 4:00PM on, October 20, 2021, our Huntington Mall Branch Office, located at 380 Huntington Mall, Barboursville, WV 25504 will be relocating. All accounts currently maintained at this branch will be transferred to our new US RT 60 Branch Office, located at 3413 US RT 60, Barboursville, WV 25504. Your accounts will be transferred automatically to the branch. No action by you will be necessary.

The new office will open on October 29, 2021, at 9:00AM. The new location will have an in-office mortgage loan originator, safe deposit boxes, and offer better access to the facility with more parking. The new office will observe the following hours of operation:

Any person wishing to comment on this proposed branch closing may file comments with the Office of the Comptroller of the Currency, Roanoke Field Office, 4419 Pheasant Ridge Road, 3rd Floor, Suite 300, Roanoke, VA 24014. Comments should be received by the proposed closing date.

If you have any questions, call us at 304-733-0150. We look forward to serving your banking needs for years to come.

Sincerely,

*Matthew M. Wagner*

Matthew M. Wagner  
President & CEO

**Main Office**  
1049 Fifth Avenue  
Huntington, WV 25701

Census Tract #0109.00

**HOURS**

**Lobby**  
Monday through Thursday 9-3  
Friday 9-5

**Drive-thru & Walk Up**  
Mon-thru Friday 8-6  
Saturday 8-3

**SERVICES OFFERED**

Checking Personal  
Checking Business  
Checking  
Money Market Checking  
Health Savings Accounts

Share Loans  
Home Equity Line of Credit

Mortgage Loans  
Business Credit Line

**Savings** Passbook  
Savings Christmas  
Club  
Statement Savings

**Other Services**  
Direct Deposit  
ATM Cards  
Bank by Mail  
Automatic Loan Payments  
Notary Services  
Safe Deposit Boxes  
Drive-thru ATM

Wire Transfer Money  
Orders Internet  
Banking  
Automatic Savings Deposit Debit  
Cards  
Night Depository  
On-Line Bill Payment

## ***Westmoreland Branch***

500 Camden Road  
Huntington, WV 25704

Census Tract # 0052.00

### **HOURS**

#### **Lobby**

Monday through Thursday 9-4  
Friday 9-6

#### **Drive-thru**

Monday - Thurs 9-4  
Friday 9-6  
Saturday 8-12

### **SERVICES OFFERED**

Checking  
Personal Checking Business  
Checking Money Market  
Checking Health Savings  
Accow1ts

#### **Investments**

Certificates of Deposit  
Individual Retirement Accounts - Traditional, Roth, SEP

#### **Lending**

Share Loans

**Savings** Passbook  
Savings Christmas  
Club  
Statement Savings

#### **Other Services**

Direct Deposit	Wire Transfer Money
ATM Cards	Orders Internet
Bank by Mail	Banking
Automatic Loan Payments	Automatic Savings Deposit Debit
Notary Services	Cards
Night Depository	On-Line Bill Payment
Drive-thru ATM	

## ***East Hills Branch***

5175 Rt. 60  
Huntington, WV 25705

*Census Traci# 0102.00*

### **HQJJRS**

#### **Lobby**

Monday through Thursday 9-4  
Friday 9- 6

#### **Drive-thru**

Mon-thru Thurs 9-4  
Friday 9-6  
Saturday 8-12

### **SERVICES OFFERED**

#### **Checking**

Personal Checking Business  
Checking Money Market  
Checking Health Savings  
Accounts

#### **Investments**

Certificates of Deposit  
Individual Retirement Accounts - Traditional, Roth, SEP

#### **Lending**

Share Loans

#### **Savings**

Passbook Savings  
Christmas Club Statement  
Savings

#### **Other Services**

Direct Deposit  
ATM Cards  
Bank By Mail

#### **Automatic Loan Payments**

Wire Transfer Money  
Orders Internet

#### **Banking**

Automatic Savings Deposit Debit

Notary Services

Cards

Safe Deposit Boxes

Night Depository

Drive-thru ATM

On-Line Bill Payment

## Barboursville Branch

3413 USRT60  
East Huntington, WV 25504

*Census Tract # 0103.00*

## **HOURS**

## lobby

Monday through Thursday 9-4  
Friday 9-6

## Drive-thru

Mon-thru Thurs 9-4  
Friday 9-6  
Saturday 8-12

## **SERVICES OFFERED**

---

Checking Personal  
Checking Business  
Checking  
Money Market Checking Health  
Savings Accounts

## Investments

## Certificates of Deposit Individual Retirement Accounts - Traditional, Roth SEP

lending

**Share Loans**      **Mortgage Loans**  
**Home Equity Line of Credit**      **Business Credit Line**

## Savings Passbook

Savings Christmas  
Club  
Statement Savings

## Other Services

Direct Deposit  
ATM Cards Bank  
By Mail  
Automatic Loan Payments

Wire Transfer Money  
Orders Internet  
Banking  
Automatic Savings Deposit Debit

Notary Services	Cards
Safe Deposit Boxes	Night Depository
Drive-thru ATM	On-Line Bill Payment

# Teays Valley Branch

3903 Teays Valley Rd  
Hurricane, WV 25526

*Census Tract # 0206.04*

## **HOURS**

### **Lobby**

Monday through Thursday 9-4  
Friday 9-6

### **Drive-thru**

Mon-thru Thurs 9-4  
Friday 9-6  
Saturday 8-12

## **SERVICES OFFERED**

### **Checking**

Personal Checking Business  
Checking Money Market  
Checking Health Savings  
Accounts

### **Investments**

Certificates of Deposit  
Individual Retirement Accounts - Traditional, Roth, SEP

### **Lending**

Share Loans  
Home Equity Linc of Credit

Mortgage Loans  
Business Credit Line

### **Savings**

Passbook Savings  
Christmas Club Statement  
Savings

### **Other Services**

Direct Deposit  
ATM Cards Bank

Wire Transfer Money

By Mail

Orders Internet

### **Automatic Loan Payments**

Banking

Notary Services  
Safe Deposit Boxes  
Drive-thru ATM

Automatic Savings Deposit Debit

Cards

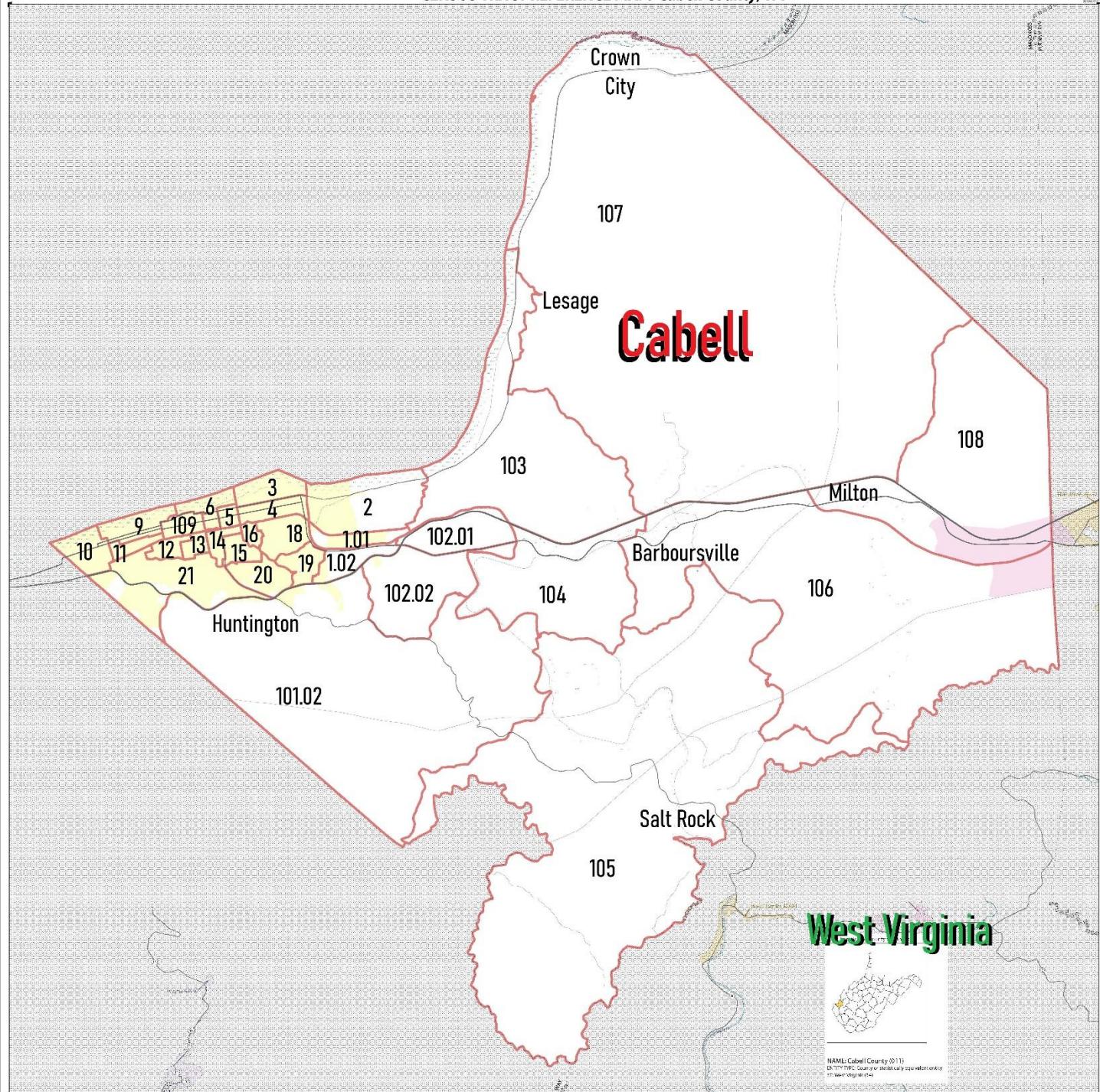
Night Depository

On-Line Bill Payment

## Proposed Office Hours

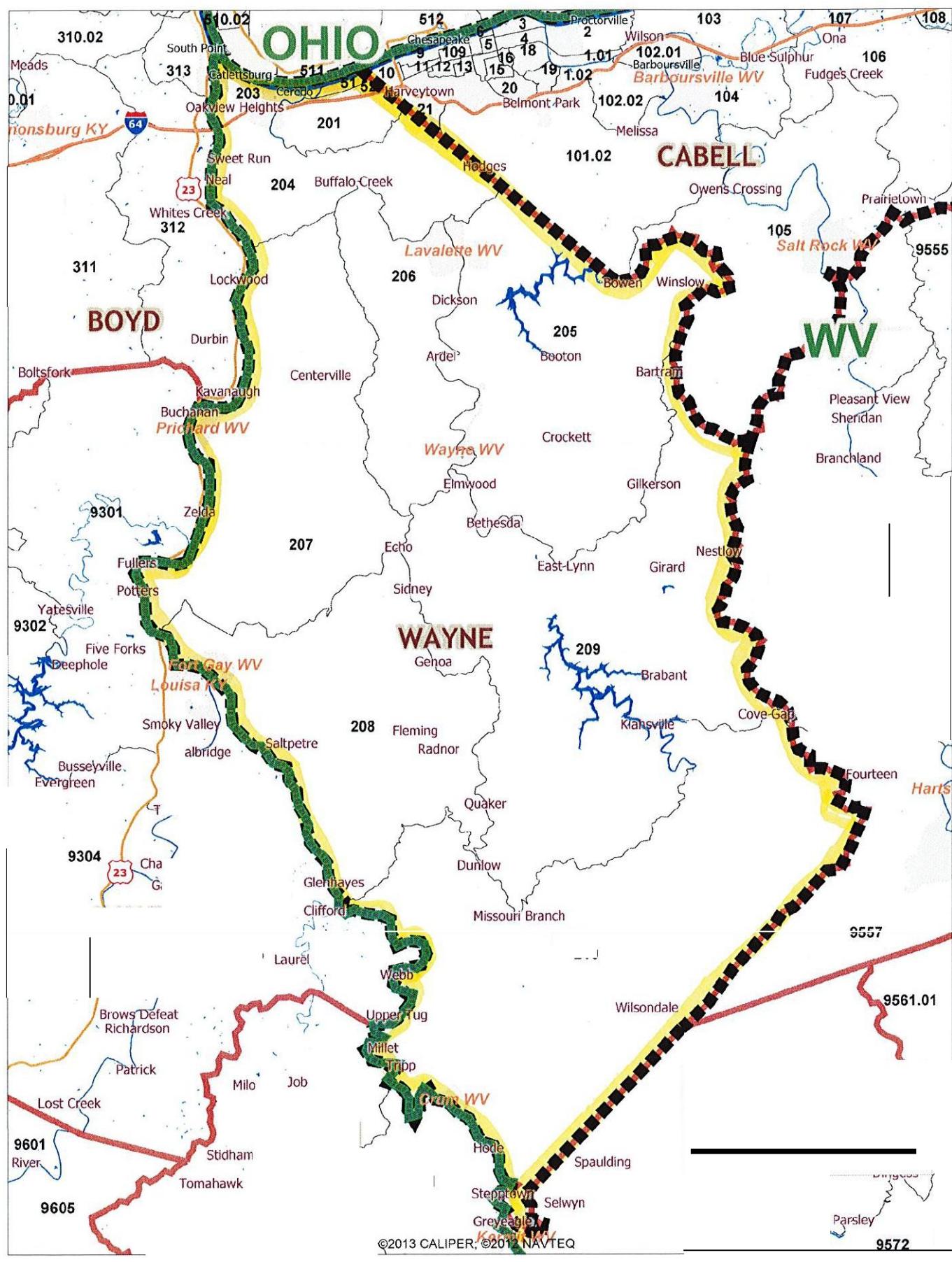
<b>Location</b>	<b>Lobby</b>	<b>Drive Thru</b>
Main Office	Monday-Thursday 9 to 3 Friday 9-5 Saturday Closed	Monday-Friday 8-6 Saturday 8-3
Teays Valley Office	Monday-Thursday 9 to 4 Friday 9-6 Saturday Saturday Closed	Monday-Thursday 9-4 Friday 9-6 Saturday 8-12
East Hills Office	Monday-Thursday 9 to 4 Friday 9-6 Closed	Monday-Thursday 9-4 Friday 9-6 Saturday 8-12
Westmoreland	Monday-Thursday 9 to 4 Friday 9-6 Saturday Closed	Monday-Thursday 9-4 Friday 9-6 Saturday 8-12
Rt 60 Barboursville	Monday-Thursday 9 to 4 Friday 9-6 Saturday Closed	Monday-Thursday 9-4 Friday 9-6 Saturday 8-12

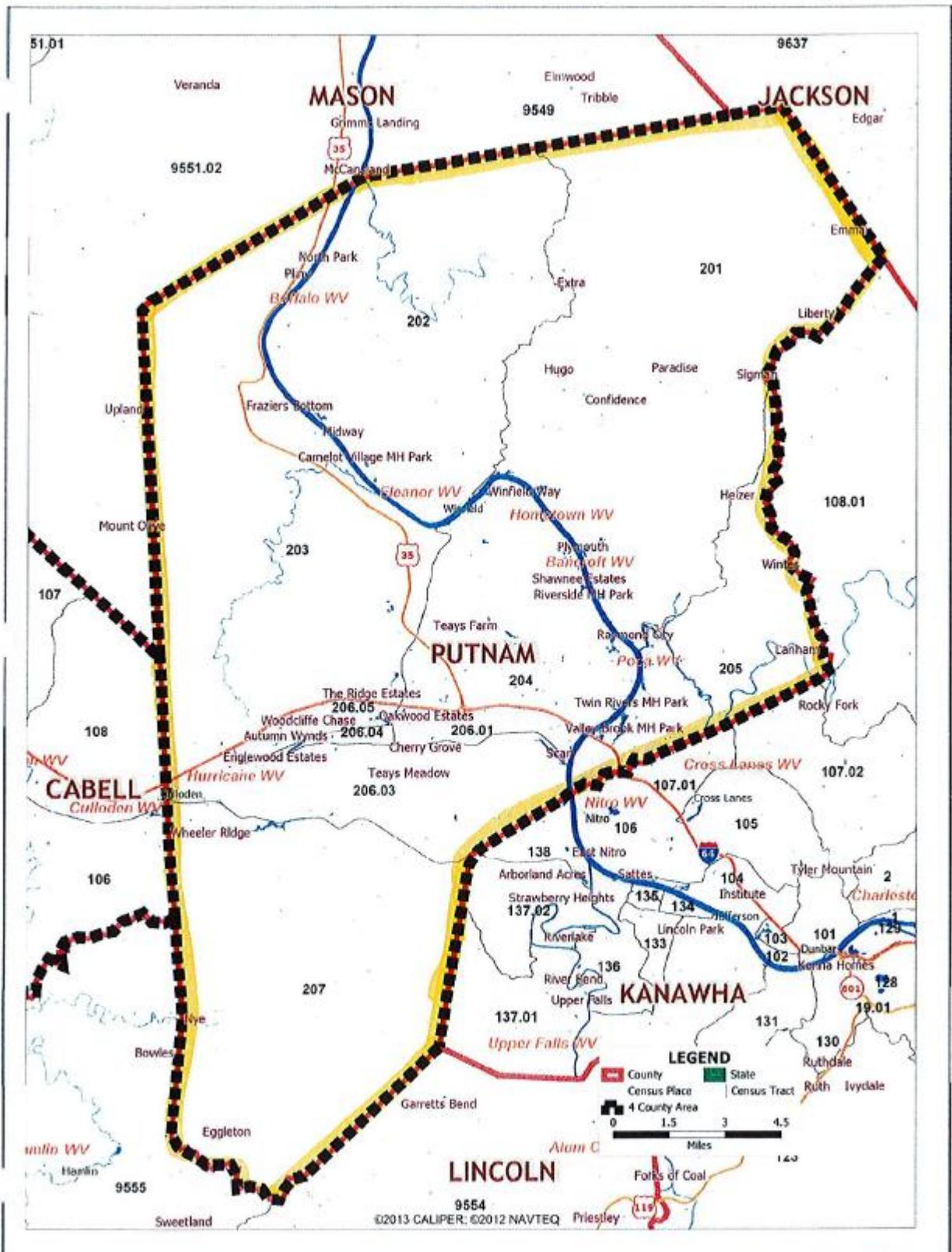
CENSUS TRACT REFERENCE MAP: Cabell County, WV

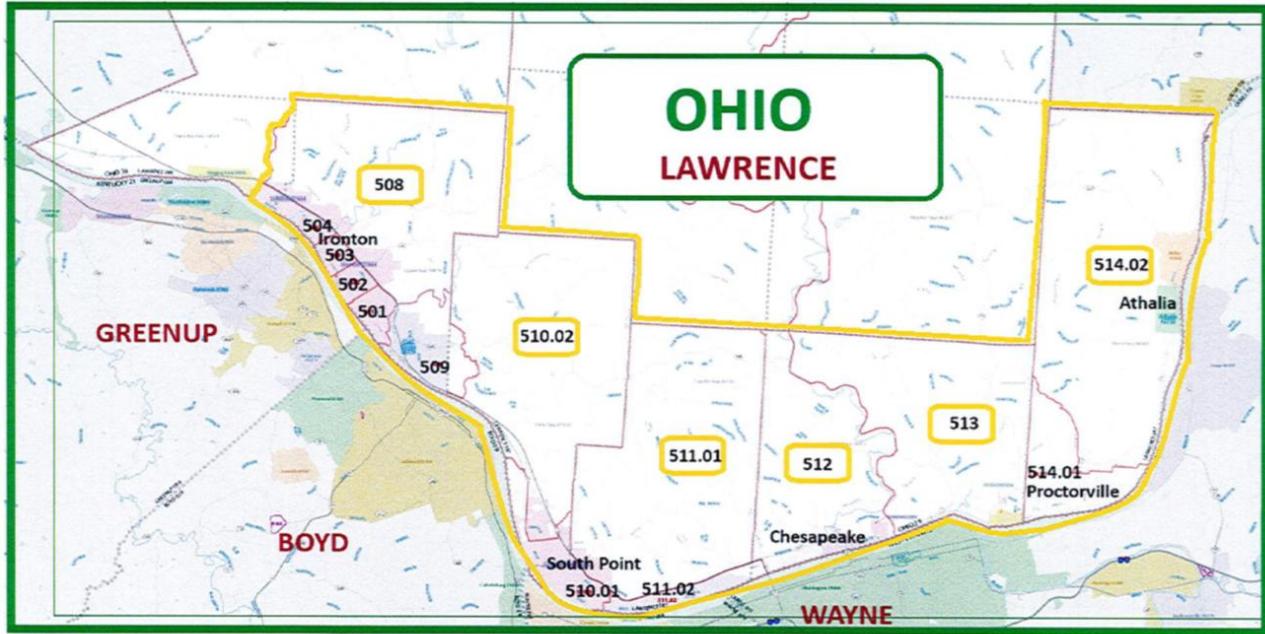


U.S. CENSUS BUREAU









Huntington Federal Savings Bank Lending Territory for Lawrence County, Ohio

Designated Lending Territory

## Huntington Federal Savings Bank Lending Territory for Lawrence County, Ohio

I \_\_\_\_\_ I  
Designated Lending Territory

**Huntington Federal Savings Bank Lending Territory for  
Lawrence County, Ohio**

**Designated Lending Territory**

**TAB 3.**  
HMDA DISCLOSURE STATEMENT

# **HOME MORTGAGE DISCLOSURE ACT NOTICE**

The HMDA data about our residential mortgage lending are available for review. The data show geographic distribution of loans and applications; ethnicity, race, gender, and income of applicants and borrowers; and information about loan approvals and denials.

This data is available online at the Consumer Financial Protection Bureau's website ([www.consumerfinance.gov/hmda](http://www.consumerfinance.gov/hmda)). HMDA data for many other financial institutions are also available at this website.

# TAB 4.

## LOAN TO DEPOSIT RATIOS

### QUARTER ENDING

1-Mar-21			52.03%
1-Jun-21			54.39%
1-Sep-21			55.67%
1-Dec-21			55.59%
1-Mar-22			56.73%
1-Jun-22			59.36%
1-Sep-22			60.57%
1-Dec-22			59.95%
1-Mar-23			59.54%
1-Jun-23			60.46%
1-Sep-23			62.85%
1-Dec-23			62.55%
1-Mar-24			63.79%
1-Jun-24			63.95%
1-Sep-24			66.89%
1-Dec-24			67.38%
1-Mar-25			64.80%
1-Jun-25			59.36%
1-Sep-25			66.03%
1-Dec-25			65.93%

## **TAB 5.**

### **COMPLAINTS**

#### **CRA Complaints:**

NONE