



## CRA PUBLIC FILE 2025

### § 345.43 Content and availability of public file.

**(a) Information available to the public.** A bank must maintain a public file, in either paper or digital format, that includes the following information:

- (1) All written comments received from the public for the current year (updated on a quarterly basis for the prior quarter by March 31, June 30, September 30, and December 31) and each of the prior two calendar years that specifically relate to the bank's performance in helping to meet community credit needs, and any response to the comments by the bank, if neither the comments nor the responses contain statements that reflect adversely on the good name or reputation of any persons other than the bank or publication of which would violate specific provisions of law;
- (2) A copy of the public section of the bank's most recent CRA performance evaluation prepared by the FDIC. The bank must include this copy in the public file within 30 business days after its receipt from the FDIC;
- (3) A list of the bank's branches, their street addresses, and census tracts;
- (4) A list of branches opened or closed by the bank during the current year (updated on a quarterly basis for the prior quarter by March 31, June 30, September 30, and December 31) and each of the prior two calendar years, their street addresses, and census tracts;
- (5) A list of retail banking services (including hours of operation, available loan and deposit products, and transaction fees) generally offered at the bank's branches and descriptions of material differences in the availability or cost of services at particular branches, if any. A bank may elect to include information regarding the availability of other systems for delivering retail banking services (for example, mobile or online banking, loan production offices, and bank-at-work or mobile branch programs);
- (6) A map of each facility-based assessment area and, as applicable, each retail lending assessment area showing the boundaries of the area and identifying the census tracts contained in the area, either on the map or in a separate list; and
- (7) Any other information the bank chooses.

**(b) Additional information available to the public —**

- (1) Banks subject to data reporting requirements pursuant to [§ 345.42](#). A bank subject to data reporting requirements pursuant to [§ 345.42](#) must include in its public file a written notice that

the CRA Disclosure Statement pertaining to the bank, its operating subsidiaries, and its other affiliates, if applicable, may be obtained on the FFIEC's website at: <https://www.ffiec.gov>. The bank must include the written notice in the public file within three business days after receiving notification from the FFIEC of the availability of the disclosure statement.

(2) Banks required to report HMDA data —

(i) HMDA Disclosure Statement. A bank required to report home mortgage loan data pursuant to [12 CFR part 1003](#) must include in its public file a written notice that the bank's HMDA Disclosure Statement may be obtained on the Consumer Financial Protection Bureau's (CFPB's) website at: <https://www.consumerfinance.gov/hmda>. In addition, if the FDIC considered the home mortgage lending of a bank's operating subsidiaries or, at a bank's election, the FDIC considered the home mortgage lending of other bank affiliates, the bank must include in its public file the names of the operating subsidiaries and the names of the affiliates and a written notice that the operating subsidiaries' and other affiliates' HMDA Disclosure Statements may be obtained at the CFPB's website. The bank must include the written notices in the public file within three business days after receiving notification from the FFIEC of the availability of the disclosure statements.

(ii) Availability of bank HMDA data. A large bank required to report home mortgage loan data pursuant to [12 CFR part 1003](#) must include in its public file a written notice that the home mortgage loan data published by the FDIC under [§ 345.42\(j\)](#) are available at the FDIC's website.

(3) Small banks. A small bank, or a bank that was a small bank during the prior calendar year, must include in its public file the bank's loan-to-deposit ratio for each quarter of the prior calendar year and, at its option, additional data on its loan-to-deposit ratio.

(4) Banks with strategic plans. A bank that has been approved to be evaluated under a strategic plan must include in its public file a copy of that plan while it is in effect. A bank need not include information submitted to the FDIC on a confidential basis in conjunction with the plan.

(5) Banks with less than “Satisfactory” ratings. A bank that received a less than “Satisfactory” institution rating during its most recent examination must include in its public file a description of its current efforts to improve its performance in helping to meet the credit needs of its entire community. The bank must update the description quarterly by March 31, June 30, September 30, and December 31, respectively.

**(c) Location of public information.** A bank must make available to the public for inspection, upon request and at no cost, the information required in this section as follows:

(1) For banks that maintain a website, all information required for the bank's public file under this section must be maintained on the bank's website.

(2) For banks that do not maintain a website:

(i) All the information required for the bank's public file must be maintained at the main office and, if an interstate bank, at one branch office in each State; and

(ii) At each branch, the following must be maintained:

(A) A copy of the public section of the bank's most recent CRA performance evaluation and a list of services provided by the branch; and

(B) Within five calendar days of the request, all the information that the bank is required to maintain under this section in the public file relating to the facility-based assessment area in which the branch is located.

**(d) Copies.** Upon request, a bank must provide copies, either on paper or in digital form acceptable to the person making the request, of the information in its public file. The bank may charge a reasonable fee not to exceed the cost of copying and mailing (if not provided in digital form).

**(e) Timing requirements.** Except as otherwise provided in this section, a bank must ensure that its public file contains the information required by this section for each of the previous three calendar years, with the most recent calendar year included in its file annually by April 1 of the current calendar year.



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**From:** [Pam McKim](#)  
**To:** [Sue Lewton](#); [Alicia Jordan](#)  
**Cc:** [Todd Cover](#); [Meghan Ball](#)  
**Subject:** FW: NEWSLETTER - and info we talked about  
**Date:** Tuesday, February 20, 2024 2:05:13 PM

---

Hello All,

I just spoke with Lisa Kazmierski at Rotary, and she sent this to me to share. Also, I talked to her about doing our presentation at the other 8 Senior Centers, they would like us to do all nine and maybe twice a year. Let me know what you think. They had 2 clients scammed one was scammed twice.



**Pam McKim, VP | Business Development | NMLS 562393**

Belmont Savings Bank • 3301 Guernsey, P.O. Box 654, Bellaire, OH 43906  
Phone: 740-676-1165 • Ext. 112 • Fax: 740-676-1185

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**From:** Lisa Kazmirski <lisa.kazmirski@ssobc.com>  
**Sent:** Tuesday, February 20, 2024 1:30 PM  
**To:** Pam McKim <pmckim@belmontsavingsbk.com>  
**Subject:** NEWSLETTER - and info we talked about

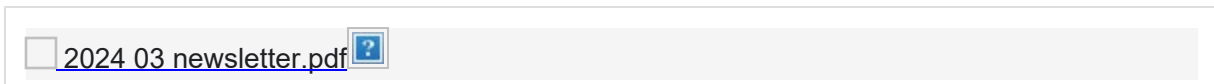
Pam,

I'm attaching a copy of our newsletter that will be distributed for MARCH.

Belmont Savings is mentioned on page 1, and a pic of your logo is pictured on page 2.

If you look at each calendar in the newsletter, there is contact info for each center at the top. If you contact any of them directly, make sure you tell them that you did a presentation in Bellaire with Tish and Jewel's help and that the seniors really benefited from it.

There is also information below ads in case Belmont Savings wants to put a permanent advertisement in it. We send a hard copy out to 3,000 seniors in Belmont County every month. As you'll see - it's a pretty cool newsletter, and it has 32 pages.



For older editions, go to our website, [ssobc.com](http://ssobc.com) and under the Home tab, choose The Golden Times.

THANKS FOR SUPPORTING OUR SENIORS!!!

--

***Lisa Kazmirski, Director***

**Senior Services of Belmont County**

67650 Oakview Drive

Saint Clairsville, OH 43950

740.695.4142



Madison Samuels

Nicholas Shaffer

airley tanky D

Henry Hamlin

Matthew Broughton

Miriam Cognier

Chloe Hardway

Hayden Carpenter

Colton Forman

John Nank

Porkchop

RUCKUS

Gabriel Wheaton

Katie Phillips

Mikayla Shaw

Savannah Shafer

Katie Windsheimer

Nicholas Davis

James

McCloud

Keehan Norton

Myatt

Tyson Carter

Daniel Kyer

Matthew Moore

London Peck

Madison Saffell

Tyree Davis

Vitae Castello

Logan Baker

Jerrilyn Beavers

Alex Stetelmeyer

Dear Rachel Dietrich and Pam McKim,  
and all of Belmont Savings Bank

Thank you for coming to our school,  
and Life Skills class to explain banking  
and teaching the students the  
important of how to manage  
monies responsibility.

Sincerely,

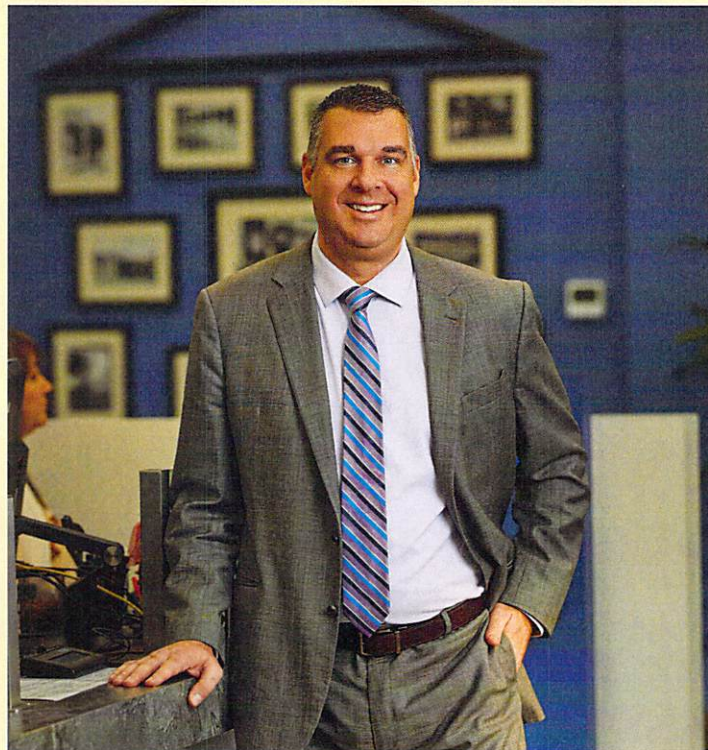
Ms. Christel Warner  
Belmont Career Center



*Building a Better Community  
Breakfast 2024*

**HONORING**

**TODD COVER**



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**NOVEMBER 14TH, 2024**  
**WHEELING ISLAND HOTEL-CASINO-RACETRACK**

---



**UNITED WAY**  
Upper Ohio  
Valley





## TODD COVER

Todd's title is impressive -- but what's more impressive is how he's both approachable and down-to-earth. His extensive background in banking, his passion for the community, and the way he cares about people helped mold him for this role.

So who is Todd Cover? Todd enjoys attending local events, including high school sports, whenever he can. And he enjoys watching his three sons play sports - 23-, 18 - and 17-years old. He'll be there first to tell you, "I'm a big sports nut".

He's also passionate about Belmont Savings Bank. "The difference at BSB is we are a local community bank," Cover said. "We like to help people. We don't just look at data and analyze numbers. There is some of that, but we like to talk to people and do what's best for them, by providing them the right product, and the best service." Cover continued. "With most banks it's either going to be a 'yes' or 'no' when it comes to lending. It's not like that at BSB. We take into account your history, what's happened in the past, some of the problems you're trying to overcome. Our team works with each customer individually to see where we might be able to help."

Todd also cares about his community. He is board vice president for Wheeling Health Right, board member for the Ohio Bankers League, board member for Regional Economic Development (RED) Partnership, West Liberty Foundation board member, a committee member for the Regional Development Funding Corporation, a Wheeling Lions Club member, a board member for Appalachian Growth Capital, finance committee member for Warwood United Methodist Church, he is past board president of the United Way of the Upper Ohio Valley, and currently head baseball coach for Wheeling Central High School. Cover is determined, whether it's helping his sons in the backyard or serving his bank's customers. "We want people in the community to come to us with their financial needs, not just one or two products," Cover said. "For us, it's about building a relationship with our customers." How may we help you today?



# Building a Better Community Breakfast 2024 Agenda

---

**Welcome** : Staci Stephen, Executive Director  
**Invocation** : Margie Carr, Pastor at First Presbyterian Church

## **\*Breakfast\***

**About United Way UOV**- Staci Stephen  
**New Brand Reveal**- Maddi Seavy, Associate Director

**Annual Sponsors & Partner Agencies** - Adriana Collelo, Marketing & Outreach Coordinator United Way UOV

**Board of Directors**- Staci Stephen

**A Message From Our Board President** -  
Tony Martinelli

**Volunteers & Committee Members**- Jane Dombroski, Development Coordinator United Way UOV

## **Awards**



Outstanding Volunteer Award  
Ogden Nutting Community Service Award  
Employee Campaign Champions  
Corporate Champions



## **\*Video\***

**Introduction of the Building a Better Community Award**-  
Staci Stephen

**Introduction of Todd Cover** - Jessica Moore, AVP of Foundations and Community Relations Wheeling and Reynolds Hospital

**Building a Better Community Award Recipient** -  
Todd Cover

**Closing Remarks** - Staci Stephen





## Board of Directors

**Tony Martinelli, President**

**Ryan Rotilio, Vice President**

**Amanda Brown, Treasurer**

**Emily Shortall, Secretary**

Meghan Ball	Jacob Keeney
Carla Bell	Ben Kittka
Craig Bommer	Susan Fox-Nolte
Sharon Campbell	Brandon Palmeri
Katie Coffield	Stephanie Paluda
Mitzi Coleman	David Robbins
Laurie Conway	Melissa Sadlowski
Jeff Emerick	Nick Sparachane
Rhonda Haley	Tony Viola
Alishah Hardway	William J. Wagner
Jill Hissom	Samantha Walters
Chris Hortert	

**Thank you:**



# COMCAST

**2024 Building a Better Community  
Breakfast Sponsor**





**UNITED WAY**  
Upper Ohio  
Valley

**Congratulations,  
Todd Cover!**

**Thank you for believing in  
the United Way's mission  
and helping to Build a  
Better Community!**



**UNITED WAY**  
Upper Ohio  
Valley

[unitedwayUOV.org](http://unitedwayUOV.org)



**OPERATION  
TOY LIFT**

**December 7  
10am-4pm**

**Parking Lot near Ulta Beauty**

**Supported by:**





**LEADERSHIP**  
is not  
**DOMINATION.**

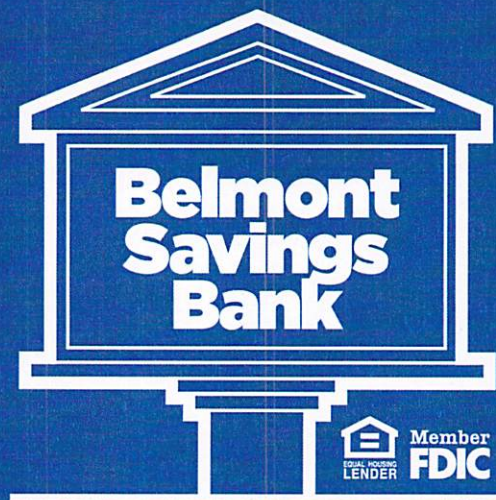
It's the art of persuading people  
to work toward a common goal.

~Daniel Goleman

**CONGRATULATIONS**  
**TODD COVER**

*This recognition is well deserved.*

*You are a game changer, passionate about the community, and an inspiration to everyone around you.*




[www.bsb.bank](http://www.bsb.bank)



RETAINING  
RECRUITING

&

 **WVU**  
Cancer  
Institute

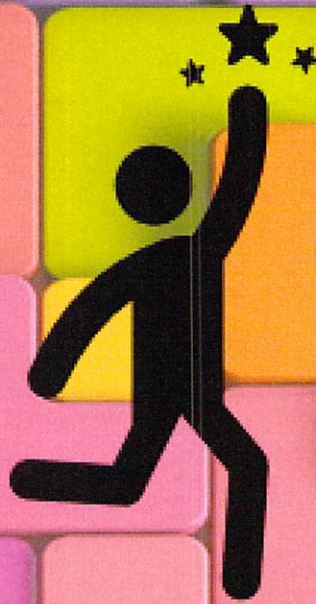
# THE REGION'S TOP DOCTORS

WHEELING HOSPITAL / REYNOLDS MEMORIAL HOSPITAL



 [WVUMedicine.org/CANCER](http://WVUMedicine.org/CANCER)





*Congratulations*  
Todd Cover  
*Building A Better Community*  
Honoree

covestro



Congratulations

Todd Cover

United Way of the Upper Ohio Valley

Building a Better Community

HONOREE



*Congratulations from the Attorneys and Staff at*



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ATTORNEYS, PLLC

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Wheeling, WV

St. Clairsville, OH

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**WISHING TODD COVER CONGRATULATIONS  
ON BEHALF OF THE HEALTH PLAN!**



**OUR ROOTS  
RUN DEEP**

*Thank You Todd Cover*

FOR YOUR OUTSTANDING CONTRIBUTIONS TO UNITED WAY AND OUR COMMUNITY.

**MPLX**  
®

PROUD PARTNER OF UNITED WAY  
OF THE UPPER OHIO VALLEY



**CONGRATULATIONS,  
TODD COVER!**



**LEAVE THE ROOF TO US.**

**NEW CONSTRUCTION/RE-ROOF - GUTTERS & DOWNSPOUTS  
MAINTENANCE & REPAIRS - INSURANCE CLAIMS - FREE ESTIMATES**


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**CHESAPEAKE** + **SWN** = **expand**  
ENERGY Southwestern Energy

**CONGRATULATIONS TODD!**

Thank you for your unwavering  
selflessness, generosity and  
leadership across the Ohio Valley!

 [www.expandenergy.com](http://www.expandenergy.com)

 @Expand-Energy



# Congratulations Todd Cover

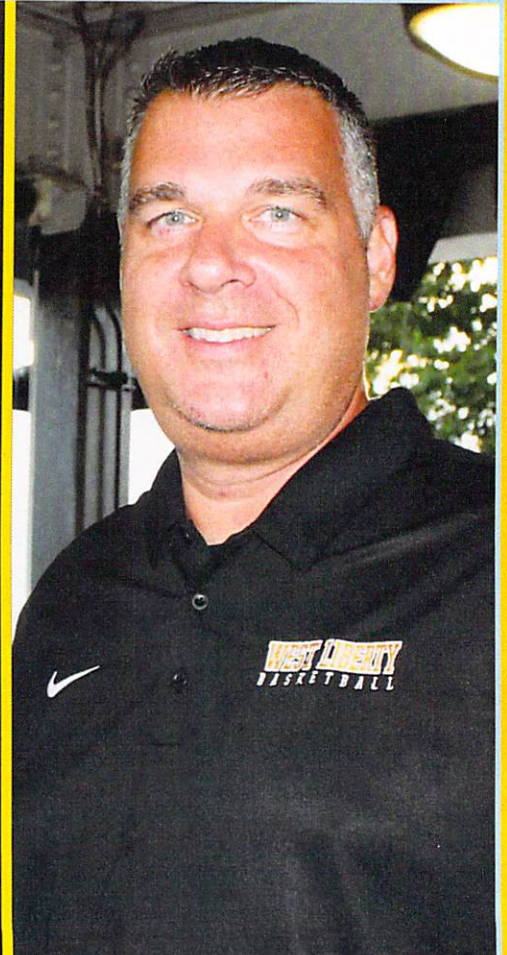
This is so well-deserved! Your dedication to your community is truly inspiring.

Wheeling Health Right Board & Staff



# Congratulations Todd!

West Liberty University is thankful  
to Todd Cover for his contributions  
to the community.





Proud supporter of  
United Way

# Westlake

*Enhancing Your Life Every Day<sup>®</sup>*



Westlake Natrium employees participating in United Way's Day of Caring

## Congratulations Todd Cover!

Thank you for your service  
to our community.



Westlake.com

# **Panhandle** CLEANING & RESTORATION

# Congratulations, Todd Cover!



Congratulations, Todd Cover!  
Build a Better Community Honoree

**CARDINAL**  
POWER PLANT



**CONGRATULATIONS!**  
**TODD COVER**  
BUILD A BETTER COMMUNITY  
NOMINEE



**WHEELING**  
**UNIVERSITY**

EDUCATING MEN & WOMEN FOR LIFE, LEADERSHIP, AND SERVICE

eliminating racism  
empowering women

**ywca**

Wheeling

*Congrats,  
Todd!*

JOB WELL DONE! WE'RE PROUD OF YOU!

Congratulations,  
Todd Cover  
on this well-deserved  
achievement.

**cb** Community Bank  
[www.cb.bank](http://www.cb.bank)



## **CRA PUBLIC FILE 2025**

### **§ 345.43 Content and availability of public file.**

(a) *Information available to the public.* A bank shall maintain a public file that includes the following information:

- (2) A copy of the public section of the Bank's most recent CRA Performance Evaluation prepared by the FDIC. The Bank shall place this copy in the Public File within 30 business days after its receipt from the FDIC.

# **PUBLIC DISCLOSURE**

August 13, 2024

## **COMMUNITY REINVESTMENT ACT PERFORMANCE EVALUATION**

Belmont Savings Bank  
Certificate Number: 28348

426 34th Street  
Bellaire, Ohio 43906

Federal Deposit Insurance Corporation  
Division of Depositor and Consumer Protection  
Chicago Regional Office

300 South Riverside Plaza, Suite 1700  
Chicago, Illinois 60606

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

## TABLE OF CONTENTS

INSTITUTION RATING .....	1
DESCRIPTION OF INSTITUTION .....	2
DESCRIPTION OF ASSESSMENT AREA .....	3
SCOPE OF EVALUATION .....	6
CONCLUSIONS ON PERFORMANCE CRITERIA .....	6
DISCRIMINATORY OR OTHER ILLEGAL CREDIT PRACTICES REVIEW.....	15
APPENDICES .....	16
INTERMEDIATE SMALL BANK PERFORMANCE CRITERIA .....	16
GLOSSARY .....	17

## INSTITUTION RATING

**INSTITUTION'S CRA RATING:** This institution is rated **Outstanding**.

An institution in this group has an outstanding record of helping to meet the credit needs of its assessment area, including low- and moderate-income neighborhoods, in a manner consistent with its resources and capabilities. The bank's outstanding performance under the Community Development Test and satisfactory performance under the Lending Test support the overall rating.

**The Lending Test is rated Satisfactory.**

The following statements support Belmont Savings Bank's (BSB) satisfactory Community Reinvestment Act (CRA) performance under the Lending Test:

- The loan-to-deposit ratio is reasonable given the institution's size, financial condition, and assessment area (AA) credit needs.
- The bank made a majority of its home mortgage and small business loans in its AA.
- The geographic distribution of loans reflects excellent dispersion throughout its AA.
- The distribution of borrowers reflects, given the demographics of the AA, reasonable penetration of borrowers of different incomes and businesses of different sizes.
- The institution did not receive any CRA-related complaints since the previous evaluation; therefore, this factor did not affect the Lending Test rating.

**The Community Development Test is rated Outstanding.**

BSB's Community Development performance demonstrated outstanding responsiveness to community development needs in its AA through community development loans, qualified investments and donations, and community development services, considering the institution's capacity, need, and availability of such opportunities in the bank's AA.

## DESCRIPTION OF INSTITUTION

BSB is a \$501.2 million mutually-owned deposit institution headquartered in Bellaire, Ohio. BSB received a “Satisfactory” rating at its previous FDIC CRA Performance Evaluation dated November 4, 2021, based on Interagency Intermediate Small Institution Procedures.

BSB continues to operate a main office and three full-service branches within Belmont County, Ohio. BSB did not open or close any branches since the prior evaluation. However, the main office was relocated to 426 South 34<sup>th</sup> Street in Bellaire, Ohio from its prior location at 3301 Guernsey Street in Belmont County. Both locations are located on the same city block. The following table provides additional information on the branch locations.

Office Locations					
Address	City	State	County	ATM	Census Tract Income Level
426 34th Street (Main Office)	Bellaire	Ohio	Belmont	Yes	Moderate
215 West Main Street	St. Clairsville	Ohio	Belmont	Yes	Upper
298 State Highway 7	Powhatan Point	Ohio	Belmont	Yes	Middle
915 East Main Street	Barnesville	Ohio	Belmont	Yes	Moderate
<i>Source: Bank Records, 2020 U.S. Census Data</i>					

BSB offers home mortgage, commercial, agricultural, and consumer loan products, and provides a variety of deposit services including checking, savings, money market deposit accounts, and certificates of deposits. Alternative banking services include internet and mobile banking.

Examiners determined the primary business focus is home mortgage and small business loans. Examiners reached this conclusion by using the bank’s business strategy and the number and dollar volume of loans originated during the evaluation period.

According to the Consolidated Reports of Conditions and Income (Call Report) dated June 30, 2024, BSB’s assets totaled \$501.2 million, and included total loans of \$294.5 million, total deposits of \$355.8 million, and total securities totaling 161.8 million. The following table illustrates the loan portfolio distribution.



<b>Loan Portfolio Distribution as of 6/30/2024</b>		
<b>Loan Category</b>	<b>\$(000s)</b>	<b>%</b>
Construction, Land Development, and Other Land Loans	3,824	1.3
Secured by Farmland	0	0.0
Secured by 1-4 Family Residential Properties	172,409	58.6
Secured by Multifamily (5 or more) Residential Properties	8,684	2.9
Secured by Nonfarm Nonresidential Properties	51,793	17.6
<b>Total Real Estate Loans</b>	<b>236,710</b>	<b>80.4</b>
Commercial and Industrial Loans	32,769	11.1
Agricultural Production and Other Loans to Farmers	0	0.0
Consumer Loans	22,875	7.8
Obligations of State and Political Subdivisions in the U.S.	2,077	0.7
Other Loans	45	<.0.1
Lease Financing Receivable (net of unearned income)	0	0.0
Less: Unearned Income	0	0.0
<b>Total Loans</b>	<b>294,476</b>	<b>100.0</b>
<i>Source: Reports of Condition and Income</i>		

Examiners did not identify any financial, legal, or other impediments that affect the ability to meet AA credit needs.

## **DESCRIPTION OF ASSESSMENT AREA**

The CRA requires each financial institution to define one or more AAs within which examiners will evaluate their CRA performance. The AA has not changed since the prior evaluation. BSB continues to designate one AA, which includes Belmont County, Ohio and Ohio County, West Virginia, which are both part of the Wheeling WV-OH Metropolitan Statistical Area (MSA). The AA conforms to CRA requirements, consists of contiguous whole geographies in which the bank has offices and operates, does not reflect illegal discrimination, and does not arbitrarily exclude any low- or moderate-income geographies. The following sections discuss demographic and economic information for the AA, obtained from 2020 U.S. Census Data and 2023 D&B Data.

### **Economic and Demographic Data**

Based on the 2020 U.S. Census Data, the AA includes 40 census tracts (CTs) in Belmont County, Ohio and Ohio County, West Virginia. Of the 40 tracts, 12 are designated as moderate- income, 18 are middle-income, and 9 are upper-income. There are no low-income CTs within the AA. The following table illustrates select demographic characteristics of the AA.

Demographic Information of the Assessment Area						
Demographic Characteristics	#	Low % of #	Moderate % of #	Middle % of #	Upper % of #	NA* % of #
Geographies (Census Tracts)	40	0.0	30.0	45.0	22.5	2.5
Population by Geography	108,922	0.0	20.9	51.2	27.0	0.9
Housing Units by Geography	53,084	0.0	23.2	52.8	22.5	1.5
Owner-Occupied Units by Geography	31,269	0.0	19.4	54.2	25.8	0.7
Occupied Rental Units by Geography	11,757	0.0	29.5	46.7	20.3	3.6
Vacant Units by Geography	10,058	0.0	27.5	55.7	15.0	1.9
Businesses by Geography	10,816	0.0	26.6	40.5	31.6	1.2
Farms by Geography	398	0.0	15.8	54.3	29.4	0.5
Family Distribution by Income Level	26,485	19.5	18.0	19.7	42.9	0.0
Household Distribution by Income Level	43,026	24.3	15.7	16.9	43.1	0.0
Median Family Income MSA - 48540 Wheeling, WV-OH MSA		\$65,607	Median Housing Value			\$119,431
			Median Gross Rent			\$643
			Families Below Poverty Level			8.4%
<i>Source: 2020 U.S. Census and 2023 D&amp;B Data</i> <i>Due to rounding, totals may not equal 100.0%</i> <i>(*) The NA category consists of geographies that have not been assigned an income classification.</i>						

The analysis of small business loans under the Borrower Profile Criterion compares the distribution of lending by Gross Annual Revenue (GAR) level. According to 2023 D&B data, the AA contains 10,816 businesses with the following GAR levels:

- 84.3 percent have GARs of \$1.0 million or less;
- 4.4 percent have GARs over \$1.0 million; and
- 11.3 percent have unknown GARs.

D&B data from 2023 shows the largest industries in the AA are services at 36.8 percent, followed by non-classifiable establishments at 17.8 percent, and retail trade at 12.8 percent. The majority of businesses in the AA are small, as demonstrated by the fact that 88.5 percent of businesses operate from a single location, 62.7 percent have less than five employees, and 81.8 percent have revenues less than \$500,000. Major employers in the AA include the State of Ohio, Belmont County Hospital, Kroger Company, and Wal-Mart Stores, Incorporated.

According to the 2020 Census data, the AA contains 53,084 housing units, of which 58.9 percent are owner occupied, 22.2 percent are rental units, and 18.9 percent are vacant. The analysis of home mortgage loans under the Borrower Profile Criterion compares the distribution of loans by



borrower income level. Income levels are based on the updated Federal Financial Institutions Examination Council’s (FFIEC) adjusted median family income (MFI) ranges. The following table illustrates the MFI levels in the AA for 2022 and 2023.

<b>Median Family Income Ranges</b>				
<b>Median Family Incomes</b>	<b>Low &lt;50%</b>	<b>Moderate 50% to &lt;80%</b>	<b>Middle 80% to &lt;120%</b>	<b>Upper ≥120%</b>
<b>Wheeling, WV-OH MSA Median Family Income (48540)</b>				
2022 (\$75,400)	<\$37,700	\$37,700 to <\$60,320	\$60,320 to <\$90,480	≥\$90,480
2023 (\$84,500)	<\$42,250	\$42,250 to <\$67,600	\$67,600 to <\$101,400	≥\$101,400
<i>Source: FFIEC</i>				

**Competition**

BSB operates in a highly competitive market for deposits in the AA. According to FDIC Deposit Market Share data as of June 30, 2023, 14 financial institutions operate 45 full-service branches in the AA. Of these banks, BSB ranked sixth with 6.8 percent of market share. Three banks, all national or regional institutions, account for 61.0 percent of the deposit market share.

There is a high level of competition in the AA for home mortgage loans. Based on 2023 HMDA aggregate data, the most recent available data, 169 lenders originated or purchased 2,923 home mortgage loans in the AA. Of those lenders, BSB ranked third with 8.2 percent of the market share. The top two institutions, one national bank and one regional bank, accounted for 21.9 percent of the home mortgage market share.

BSB is not required to report its small business data, and it has elected not to do so. However, peer small business data is nonetheless helpful in determining the level of competition for such loans in the AA. Peer small business data from 2022, the most recently available data, illustrates a moderate level of competition in the AA for small business loans. In 2022, 62 lenders required to report their small business loan data granted 1,775 small business originations in the AA. Of those lenders, the top six, all national banks, accounted for 67.2 percent of the small business lending market share.

**Community Contact**

As part of the evaluation process, examiners contact third parties active in the AA to assist in identifying credit needs and opportunities. This information helps assess whether local financial institutions are responsive to those needs.

Examiners contacted a representative of a government community development organization. The contact stated the economic conditions are fairly strong and stable, with fracking interests continuing to bolster local service industries. The contact stated the local residential real estate market has slowed considerably due to high home prices and a restrictive interest rate environment. The contact also stated commercial vacancies have increased in recent quarters and remain elevated. The contact did not indicate any concerns regarding the availability of financing for creditworthy borrowers or financial services.

## **Credit and Community Development Needs and Opportunities**

Based on discussions with bank management, the community contact, and demographic and economic data, examiners determined the primary credit needs in the AA are small business and residential real estate loans.

## **SCOPE OF EVALUATION**

### **General Information**

This evaluation covers the period from the prior evaluation, dated November 4, 2021, to the current evaluation dated August 13, 2024. Examiners used the Interagency Small Institution Examination Procedures to evaluate performance.

### **Activities Reviewed**

Examiners determined that BSB's primary product lines are home mortgage and small business loans. BSB originated more home mortgage loans than small business loans during the evaluation period. As such, examiners weighted home mortgage loans more heavily in this evaluation. Examiners did not consider any other loan types, such as small farm or consumer loans, because they do not represent primary loan products for the bank.

Examiners analyzed all of the bank's home mortgage loans reported on its 2022 and 2023 Home Mortgage Disclosure Act (HMDA) Loan Application Registers (LARs). BSB originated 249 home mortgage loans totaling \$46.0 million in 2022 and 258 loans totaling \$40.3 million in 2023. Since BSB is required to report HMDA data, examiners compared the bank's home mortgage loan performance to aggregate HMDA data to analyze the bank's performance.

BSB originated 62 small business loans in 2022 totaling \$6.7 million in 2022 and 66 loans totaling \$19.3 million in 2023. Since the bank is not required to report its small business data and has elected not to do so, examiners used demographic data as a means of comparison to analyze the bank's small business lending.

Although examiners reviewed and presented the number and dollar volume of home mortgage and small business loans for the Lending Test, examiners emphasized performance by number of loans, because this is a better indicator of the number of individuals and small businesses served. In evaluating the Geographic Distribution and Borrower Profile criteria, examiners only evaluated loans extended within the AA.

## **CONCLUSIONS ON PERFORMANCE CRITERIA**

### **LENDING TEST**

Overall, BSB demonstrated reasonable performance under the Lending Test.

### **Loan-to-Deposit Ratio**

BSB's average net LTD ratio is reasonable given the bank's size, financial condition, and AA credit needs. The bank's LTD ratio, calculated from Call Report data, averaged 64.3 percent over the previous 11 calendar quarters from December 31, 2021, to June 30, 2024. The ratio has increased steadily throughout the evaluation period, ranging from a low of 48.7 percent as of December 31, 2021, to a high of 82.5 percent as of June 30, 2024. While both total loans and total deposits have increased during the evaluation period, total loans have increased at a significantly higher pace. Total loans increased 83.4 percent during the evaluation period, compared to deposit growth of 8.8 percent over the same period. As reflected in the table below, BSB's average net LTD falls within the range of two similarly-situated institutions of similar asset size, loan portfolio composition, and geographic location.

<b>Loan-to-Deposit Ratio Comparison</b>		
<b>Bank</b>	<b>Total Assets as of 6/30/2024 (\$000s)</b>	<b>Average Net LTD Ratio (%)</b>
<b>Belmont Savings Bank</b>	501,219	64.3
Similarly-Situated Institution #1	830,383	83.8
Similarly-Situated Institution #2	718,049	53.1
<i>Source: Reports of Condition and Income 12/31/2021 through 6/30/2024</i>		

### **Assessment Area Concentration**

As shown in the following table, BSB originated a majority of its small business and home mortgage loans by number and dollar volume within its AAs, except for the dollar volume of small business loans in 2023, when the bank originated several larger credits in the Ohio statewide area. Performance for home mortgage loans, by number, was relatively consistent in 2022 and 2023, while performance for small business loans improved markedly from 2022 to 2023.

Lending Inside and Outside of the Assessment Area										
Loan Category	Number of Loans				Total #	Dollar Amount of Loans				Total \$
	Inside		Outside			Inside		Outside		
	#	%	#	%		\$	%	\$	%	
Home Mortgage										
2022	182	73.1	67	26.9	249	29,518,418	64.2	16,469,922	35.8	45,988,340
2023	180	69.8	78	30.2	258	27,025,817	67.0	13,309,836	33.0	40,335,653
<b>Subtotal</b>	<b>362</b>	<b>71.4</b>	<b>145</b>	<b>28.6</b>	<b>507</b>	<b>56,544,235</b>	<b>65.5</b>	<b>29,779,758</b>	<b>34.5</b>	<b>86,323,993</b>
Small Business										
2022	35	56.5	27	43.5	62	4,213,456	63.1	2,461,034	36.9	6,674,490
2023	49	74.2	17	25.8	66	6,026,191	31.2	13,296,715	68.8	19,322,906
<b>Subtotal</b>	<b>84</b>	<b>65.6</b>	<b>44</b>	<b>34.4</b>	<b>128</b>	<b>10,239,647</b>	<b>39.4</b>	<b>15,757,749</b>	<b>60.6</b>	<b>25,997,396</b>
<b>Total</b>	<b>446</b>	<b>70.2</b>	<b>189</b>	<b>29.8</b>	<b>635</b>	<b>66,783,882</b>	<b>59.5</b>	<b>45,537,507</b>	<b>40.5</b>	<b>112,321,389</b>
<i>Source: Bank Data</i> <i>Due to rounding, totals may not equal 100.0%</i> <i>Dollar amounts for Small Business loans are multiplied by 1000.</i>										

### **Geographic Distribution**

Overall, the geographic distribution of loans reflects excellent dispersion throughout the AA. This conclusion is based primarily on home mortgage lending performance, which represents the majority of bank lending activity.

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

The geographic distribution of home mortgage loans reflects excellent dispersion throughout the AA. As reflected in the following table, bank lending in moderate-income census tracts far exceeds both the percentage of owner-occupied housing units and aggregate data in both 2022 and 2023.

<b>Geographic Distribution of Home Mortgage Loans</b>						
<b>Tract Income Level</b>	<b>% of Owner-Occupied Housing Units</b>	<b>Aggregate Performance % of #</b>	<b>#</b>	<b>%</b>	<b>\$(000s)</b>	<b>%</b>
Moderate						
2022	19.4	15.9	49	26.9	6,335	21.5
2023	19.4		48	26.7	5,408	20.0
Middle						
2022	54.2	50.2	80	44.0	10,611	35.9
2023	54.2	--	82	45.6	12,272	45.4
Upper						
2022	25.8	33.3	52	28.6	12,528	42.4
2023	25.8	--	50	27.8	9,346	34.6
Not Available						
2022	0.7	0.5	1	0.5	44	0.1
2023	0.7	--	0	0.0	0	0.0
<b>Totals</b>						
<b>2022</b>	<b>100.0</b>	<b>100.0</b>	<b>182</b>	<b>100.0</b>	<b>29,518</b>	<b>100.0</b>
<b>2023</b>	<b>100.0</b>	<b>--</b>	<b>180</b>	<b>100.0</b>	<b>27,026</b>	<b>100.0</b>
<i>Source: 2020 U.S. Census; Bank Data, 2022 HMDA Aggregate Data, "--" data not available. Due to rounding, totals may not equal 100.0%</i>						

### ***Small Business Loans***

The geographic distribution of small business loans reflects reasonable dispersion throughout the AA. The following table reflects the distribution of small business loans within the AA and includes comparative data for the distribution of businesses by the percentage of businesses by census tract. In 2022, the percentage of BSB's small business loans is slightly higher than the percentage of businesses. In 2023, bank performance exceeds the percentage of businesses.

<b>Geographic Distribution of Small Business Loans</b>						
<b>Tract Income Level</b>		<b>% of Businesses</b>	<b>#</b>	<b>%</b>	<b>\$(000s)</b>	<b>%</b>
Moderate						
	2022	27.2	10	28.6	1,708	40.5
	2023	26.6	19	38.8	1,118	18.5
Middle						
	2022	40.1	18	51.4	1,654	39.2
	2023	40.5	14	28.6	1,313	21.8
Upper						
	2022	31.4	7	20.0	851	20.2
	2023	31.6	16	32.7	3,596	59.7
Not Available						
	2022	1.3	0	0.0	0	0.0
	2023	1.2	0	0.0	0	0.0
<b>Totals</b>						
	<b>2022</b>	<b>100.0</b>	<b>35</b>	<b>100.0</b>	<b>4,214</b>	<b>100.0</b>
	<b>2023</b>	<b>100.0</b>	<b>49</b>	<b>100.0</b>	<b>6,026</b>	<b>100.0</b>
<i>Source: 2022 &amp; 2023 D&amp;B Data; Bank Data; "--" data not available. Due to rounding, totals may not equal 100.0%</i>						

### **Borrower Profile**

Overall, the distribution of borrowers reflects, given the demographics of the AA, reasonable penetration among borrowers of different income levels (including low- and moderate-income borrowers) and businesses of different sizes.

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

The distribution of loans reflects reasonable penetration among individuals of different income levels. As reflected in the following table, bank performance trailed the percentage of low-income families in both years and trailed aggregate data in 2022 (2023 data not yet available). For moderate-income borrowers, in 2022, bank performance approximates the percentage of families but trails aggregate data. However, in 2023, performance exceeds the demographic. Considering that 8.4 percent of families in the assessment area are below the poverty level and are not reasonably expected to afford homeownership, overall performance is considered reasonable.

Distribution of Home Mortgage Loans by Borrower Income Level						
Borrower Income Level	% of Families	Aggregate Performance % of #	#	%	\$(000s)	%
Low						
2022	19.5	11.4	12	6.6	867	2.9
2023	19.5		15	8.3	878	3.3
Moderate						
2022	18.0	22.5	28	15.4	3,191	10.8
2023	18.0		37	20.6	4,506	16.7
Middle						
2022	19.7	20.8	41	22.5	6,267	21.2
2023	19.7	--	39	21.7	4,585	17.0
Upper						
2022	42.9	29.7	72	39.6	15,635	53.0
2023	42.9	--	70	38.9	13,885	51.4
Not Available						
2022	0.0	15.7	29	15.9	3,558	12.1
2023	0.0	--	19	10.6	3,172	11.7
<b>Totals</b>						
<b>2022</b>	<b>100.0</b>	<b>100.0</b>	<b>182</b>	<b>100.0</b>	<b>29,518</b>	<b>100.0</b>
<b>2023</b>	<b>100.0</b>	<b>--</b>	<b>180</b>	<b>100.0</b>	<b>27,026</b>	<b>100.0</b>
<i>Source: 2020 U.S. Census; Bank Data, 2022 HMDA Aggregate Data, "--" data not available.  Due to rounding, totals may not equal 100.0%</i>						

### ***Small Business Loans***

The distribution of small business loans reflects, given the demographics of the AA, reasonable penetration among businesses of different sizes. As reflected in the following table, the percentage of bank loans slightly exceeded the percentage of businesses with GARs of less than \$1 million in 2022. The percentage of bank loans to businesses with GARs of less than \$1 million declined in 2023 but is considered reasonable. It is noted that not all businesses require financing, and some businesses, particularly very small entities, may use alternative forms of financing, such as credit cards to meet these needs.

Distribution of Small Business Loans by Gross Annual Revenue Category					
Gross Revenue Level	% of Businesses	#	%	\$(000s)	%
<b>&lt;=\$1,000,000</b>					
2022	83.0	30	85.7	2,924	69.4
2023	84.3	35	71.4	3,912	64.9
<b>&gt;\$1,000,000</b>					
2022	4.7	5	14.3	1,290	30.6
2023	4.4	14	28.6	2,115	35.1
<b>Revenue Not Available</b>					
2022	12.2	0	0.0	0	0.0
2023	11.3	0	0.0	0	0.0
<b>Totals</b>					
<b>2022</b>	<b>100.0</b>	<b>35</b>	<b>100.0</b>	<b>4,214</b>	<b>100.0</b>
<b>2023</b>	<b>100.0</b>	<b>49</b>	<b>100.0</b>	<b>6,026</b>	<b>100.0</b>
<i>Source: 2022 &amp; 2023 D&amp;B Data; Bank Data; "--" data not available. Due to rounding, totals may not equal 100.0%</i>					

### **Response to Complaints**

The bank did not receive any CRA-related complaints since the previous evaluation; therefore, this criterion did not affect the bank’s overall rating.

## **COMMUNITY DEVELOPMENT TEST**

BSB’s community development activities demonstrate outstanding responsiveness to the needs of the AA through community development loans, qualified investments, and community development services, as appropriate, considering the institution’s capacity and the need and availability of such opportunities for community development in the institution’s AA. Given the economic conditions of the area and other performance context factors, examiners considered the bank’s level of activity excellent.

### **Community Development Loans**

BSB demonstrated it’s a strategic commitment to community development through a significant increase in community development lending during the evaluation period. BSB originated 34 community development loans totaling approximately \$22.2 million during the evaluation period, which is significantly higher than the previous evaluation when the bank originated 8 community development loans totaling \$2.2 million. The majority of these loans involved affordable housing and community services for residents within the AA. This level of activity represents 7.5 percent of total loans and 4.4 percent of total assets. These percentages represent a significant increase from the previous evaluation, when the percentages were 2.0 percent and 0.6 percent, respectively.



BSB’s level of activity far exceeded the performance of two SSIs in terms of community development loans. Both SSIs received satisfactory ratings under the Community Development Test. Examiners selected SSIs based on asset size, geographic location, and lending focus. The following table illustrates the bank’s community development lending by AA and community development purpose during the evaluation period.

<b>Community Development Lending</b>										
<b>Activity Year</b>	<b>Affordable Housing</b>		<b>Community Services</b>		<b>Economic Development</b>		<b>Revitalize or Stabilize</b>		<b>Totals</b>	
	<b>#</b>	<b>\$(000s)</b>	<b>#</b>	<b>\$(000s)</b>	<b>#</b>	<b>\$(000s)</b>	<b>#</b>	<b>\$(000s)</b>	<b>#</b>	<b>\$(000s)</b>
2021*	-	-	-	-	-	-	-	-	-	-
2022	1	144	-	-	2	694	-	-	-	-
2023	10	1,545	4	7,103	10	4,201	5	698	32	14,385
YTD 2024**	-	-	2	7,800	-	-	-	-	2	7,800
<b>Total</b>	11	1,689	6	14,903	12	4,895	5	698	34	22,185

*Source: Bank Records, \*11/5/2021-12/31/2021; \*\*01/01/2024-8/13/2024*

Notable community development loans include:

- Two loans totaling \$6.8 million to a community development organizations that provides emergency shelter, housing assistance, and services to victims of domestic abuse.
- Ten loans totaling \$1.5 million to a community development organization that provides affordable housing for low- and moderate-income families.

**Qualified Investments**

During the evaluation period, BSB had 16 investments in its AAs totaling approximately \$3.2 million, and 43 qualifying donations totaling approximately \$34,000. By number and dollar volume, activity is down from the prior evaluation. However, the bank’s current level of activity equates to 8.9 percent of total securities and 2.9 percent of total assets, up significantly from the prior evaluation when these figures were 2.5 percent and 1.6 percent, respectively. The bank’s percentages also exceed that of the two SSIs. The following table shows the qualified investment and grant activities by community development purpose and AA.

In addition, during the evaluation period, the bank had three out-of-state investments consisting of certificates of deposits at minority-owned institutions totaling \$700,000.

Qualified Investments										
Activity Year	Affordable Housing		Community Services		Economic Development		Revitalize or Stabilize		Totals	
	#	\$(000s)	#	\$(000s)	#	\$(000s)	#	\$(000s)	#	\$(000s)
2021*	-	-	-	-	-	-	-	-	-	-
2022	5	352	-	-	-	-	-	-	5	352
2023	6	2,102	-	-	-	-	-	-	6	2,102
YTD 2024**	5	703	-	-	-	-	-	-	5	703
<b>Subtotal</b>	<b>16</b>	<b>3,157</b>	-	-	-	-	-	-	<b>16</b>	<b>3,157</b>
Qualified Grants & Donations	1	1	42	33	-	-	-	-	43	34
<b>Total</b>	<b>17</b>	<b>3,158</b>	<b>42</b>	<b>33</b>	-	-	-	-	<b>59</b>	<b>3,191</b>
<i>Source: Bank Data, *11/15/2021-12/31/2021; **01/01/2024-8/13/2024</i>										

Notable examples of the bank’s qualified grants and donations include the following:

- 16 investments totaling \$3,157,000 to an organization that works with private and public developers to facilitate the construction, rehabilitation, and preservation of affordable housing.
- Two donations totaling \$7,000 to an organization that supplies school clothing for low- and moderate-income families and individuals.
- Four donations totaling \$1,600 to an organization that provides food, services, and other assistance for low and moderate-income individuals and families

### **Community Development Services**

During the review period, BSB employees provided 69 instances of community development services within the AAs, a slight decline since the prior evaluation when the bank provided 74 such services. BSB’s level of community development services is below two SSIs who received satisfactory ratings. The majority of the services provided by BSB’s employees were to community service organizations that provide financial literacy programs. The following table illustrates community development services during the evaluation period.

<b>Community Development Services</b>					
<b>Activity Year</b>	<b>Affordable Housing</b>	<b>Community Services</b>	<b>Economic Development</b>	<b>Revitalize or Stabilize</b>	<b>Totals</b>
	<b>#</b>	<b>#</b>	<b>#</b>	<b>#</b>	<b>#</b>
2021*	-	14	4	-	18
2022	-	13	5	-	18
2023	-	15	5	-	20
YTD 2024**	-	8	5	-	13
<b>Total</b>	-	50	19	-	69
<i>Source: Bank Records, *11/15//2021-12/31/2021; **01/01/2024-8/13/2024</i>					

Notable services include:

- A Board member serves on the Board of a regional economic development agency.
- A bank officer serves on the Advisory Board of an organization that provides microloans to small businesses.
- A bank officer serves on the Loan Committee of an economic development agency that provides funding to low- and moderate geographies and individuals.
- Several employees participated in a financial literacy program throughout the evaluation period in schools where over 50 percent of the students receive free or reduced cost lunch.

## **DISCRIMINATORY OR OTHER ILLEGAL CREDIT PRACTICES REVIEW**

Examiners reviewed the bank’s compliance with the laws relating to discrimination and other illegal credit practices including the Fair Housing Act and the Equal Credit Opportunity Act. Examiners did not identify any evidence of discrimination or other illegal credit practices.

## APPENDICES

### INTERMEDIATE SMALL BANK PERFORMANCE CRITERIA

#### **Lending Test**

The Lending Test evaluates the bank's record of helping to meet the credit needs of its assessment area(s) by considering the following criteria:

- 1) The bank's loan-to-deposit ratio, adjusted for seasonal variation, and, as appropriate, other lending-related activities, such as loan originations for sale to the secondary markets, community development loans, or qualified investments;
- 2) The percentage of loans, and as appropriate, other lending-related activities located in the bank's assessment area(s);
- 3) The geographic distribution of the bank's loans;
- 4) The bank's record of lending to and, as appropriate, engaging in other lending-related activities for borrowers of different income levels and businesses and farms of different sizes; and
- 5) The bank's record of taking action, if warranted, in response to written complaints about its performance in helping to meet credit needs in its assessment area(s).

#### **Community Development Test**

The Community Development Test considers the following criteria:

- 1) The number and amount of community development loans;
- 2) The number and amount of qualified investments;
- 3) The extent to which the bank provides community development services; and
- 4) The bank's responsiveness through such activities to community development lending, investment, and service needs.

## GLOSSARY

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

**American Community Survey (ACS):** A nationwide United States Census survey that produces demographic, social, housing, and economic estimates in the form of five year estimates based on population thresholds.

**Area Median Income:** The median family income for the MSA, if a person or geography is located in an MSA; or the statewide nonmetropolitan median family income, if a person or geography is located outside an MSA.

**Assessment Area:** A geographic area delineated by the bank under the requirements of the Community Reinvestment Act.

**Census Tract:** A small, relatively permanent statistical subdivision of a county or equivalent entity. The primary purpose of census tracts is to provide a stable set of geographic units for the presentation of statistical data. Census tracts generally have a population size between 1,200 and 8,000 people, with an optimum size of 4,000 people. Census tract boundaries generally follow visible and identifiable features, but they may follow nonvisible legal boundaries in some instances. State and county boundaries always are census tract boundaries.

**Combined Statistical Area (CSA):** A combination of several adjacent metropolitan statistical areas or micropolitan statistical areas or a mix of the two, which are linked by economic ties.

**Community Development:** For loans, investments, and services to qualify as community development activities, their primary purpose must:

- (1) Support affordable housing for low- and moderate-income individuals;
- (2) Target community services toward low- and moderate-income individuals;
- (3) Promote economic development by financing small businesses or farms; or
- (4) Provide activities that revitalize or stabilize low- and moderate-income geographies, designated disaster areas, or distressed or underserved nonmetropolitan middle-income geographies.

**Community Development Corporation (CDC):** A CDC allows banks and holding companies to make equity type of investments in community development projects. Institution CDCs can develop innovative debt instruments or provide near-equity investments tailored to the development needs of the community. Institution CDCs are also tailored to their financial and marketing needs. A CDC may purchase, own, rehabilitate, construct, manage, and sell real property. Also, it may make equity or debt investments in development projects and in local businesses. The CDC activities are expected to directly benefit low- and moderate-income groups, and the investment dollars should not represent an undue risk on the banking organization.

**Community Development Financial Institutions (CDFIs):** CDFIs are private intermediaries (either for profit or nonprofit) with community development as their primary mission. A CDFI facilitates the flow of lending and investment capital into distressed communities and to individuals who have been unable to take advantage of the services offered by traditional financial institutions. Some basic types of CDFIs include community development banks, community development loan funds, community development credit unions, micro enterprise funds, and community development venture capital funds.

A certified CDFI must meet eligibility requirements. These requirements include the following:

- Having a primary mission of promoting community development;
- Serving an investment area or target population;
- Providing development services;
- Maintaining accountability to residents of its investment area or targeted population through representation on its governing board of directors, or by other means;
- Not constituting an agency or instrumentality of the United States, of any state or political subdivision of a state.

**Community Development Loan:** A loan that:

- (1) Has as its primary purpose community development; and
- (2) Except in the case of a wholesale or limited purpose institution:
  - (i) Has not been reported or collected by the institution or an affiliate for consideration in the institution's assessment area as a home mortgage, small business, small farm, or consumer loan, unless it is a multifamily dwelling loan (as described in Appendix A to Part 203 of this title); and
  - (ii) Benefits the institution's assessment area(s) or a broader statewide or regional area including the institution's assessment area(s).

**Community Development Service:** A service that:

- (1) Has as its primary purpose community development;
- (2) Is related to the provision of financial services; and
- (3) Has not been considered in the evaluation of the institution's retail banking services under § 345.24(d).

**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.

**Core Based Statistical Area (CBSA):** The county or counties or equivalent entities associated with at least one core (urbanized area or urban cluster) of at least 10,000 population, plus adjacent counties having a high degree of social and economic integration with the core as measured through commuting ties with the counties associated with the core. Metropolitan and Micropolitan Statistical Areas are the two categories of CBSAs.

**Distressed Middle-Income Nonmetropolitan Geographies:** A nonmetropolitan middle-income geography will be designated as distressed if it is in a county that meets one or more of the following triggers:

- (1) An unemployment rate of at least 1.5 times the national average;
- (2) A poverty rate of 20 percent or more; or
- (3) A population loss of 10 percent or more between the previous and most recent decennial census or a net migration loss of 5 percent or more over the 5-year period preceding the most recent census.

**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. Other family 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).

**FFIEC-Estimated Income Data:** The Federal Financial Institutions Examination Council (FFIEC) issues annual estimates which update median family income from the metropolitan and nonmetropolitan areas. The FFIEC uses American Community Survey data and factors in information from other sources to arrive at an annual estimate that more closely reflects current economic conditions.

**Full-Scope Review:** A full-scope review is accomplished when examiners complete all applicable interagency examination procedures for an assessment area. Performance under applicable tests is analyzed considering performance context, quantitative factors (e.g, geographic distribution, borrower profile, 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 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 applicants; the amount of loan requested; and the disposition of the application (approved, denied, and withdrawn).

**Home Mortgage Loans:** Includes closed-end mortgage loans or open-end line of credits as defined in the HMDA regulation that are not an excluded transaction per the HMDA regulation.

**Housing Unit:** Includes a house, an apartment, a mobile home, a group of rooms, or a single room that is occupied as separate living quarters.

**Limited-Scope Review:** A limited scope review is accomplished when examiners do not complete all applicable interagency examination procedures for an assessment area.

Performance under applicable tests is often analyzed using only quantitative factors (e.g, geographic distribution, borrower profile, 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.

**Low Income Housing Tax Credit:** The Low-Income Housing Tax Credit Program is a housing program contained within the Internal Revenue Code of 1986, as amended. It is administered by the U.S. Department of the Treasury and the Internal Revenue Service. The U.S. Treasury Department distributes low-income housing tax credits to housing credit agencies through the Internal Revenue Service. The housing agencies allocate tax credits on a competitive basis.

Developers who acquire, rehabilitate, or construct low-income rental housing may keep their tax credits. Or, they may sell them to corporations or investor groups, who, as owners of these properties, will be able to reduce their own federal tax payments. The credit can be claimed annually for ten consecutive years. For a project to be eligible, the developer must set aside a specific percentage of units for occupancy by low-income residents. The set-aside requirement remains throughout the compliance period, usually 30 years.

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

**Median Income:** The median income divides the income distribution into two equal parts, one having incomes above the median and other having incomes below the median.

**Metropolitan Division (MD):** A county or group of counties within a CBSA that contain(s) an urbanized area with a population of at least 2.5 million. A MD is one or more main/secondary counties representing an employment center or centers, plus adjacent counties associated with the main/secondary county or counties through commuting ties.

**Metropolitan Statistical Area (MSA):** CBSA associated with at least one urbanized area having a population of at least 50,000. The MSA comprises the central county or counties or equivalent entities 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 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 and less than 80 percent in the case of a geography.

**Multi-family:** Refers to a residential structure that contains five or more units.



**Nonmetropolitan Area** (also known as **non-MSA**): All areas outside of metropolitan areas. The definition of nonmetropolitan area is not consistent with the definition of rural areas. Urban and rural classifications cut across the other hierarchies. For example, there is generally urban and rural territory within metropolitan and nonmetropolitan areas.

**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 lawful investment, deposit, membership share, or grant that has as its primary purpose community development.

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

**Rural Area:** Territories, populations, and housing units that are not classified as urban.

**Small Business Investment Company (SBIC):** SBICs are privately-owned investment companies which are licensed and regulated by the Small Business Administration (SBA). SBICs provide long-term loans and/or venture capital to small firms. Because money for venture or risk investments is difficult for small firms to obtain, SBA provides assistance to SBICs to stimulate and supplement the flow of private equity and long-term loan funds to small companies. Venture capitalists participate in the SBIC program to supplement their own private capital with funds borrowed at favorable rates through SBA's guarantee of SBIC debentures. These SBIC debentures are then sold to private investors. An SBIC's success is linked to the growth and profitability of the companies that it finances. Therefore, some SBICs primarily assist businesses with significant growth potential, such as new firms in innovative industries. SBICs finance small firms by providing straight loans and/or equity-type investments. This kind of financing gives them partial ownership of those businesses and the possibility of sharing in the companies' profits as they grow and prosper.

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

**Small Farm Loan:** 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, including farm residential and other improvements, or are classified as loans to finance agricultural production and other loans to farmers.

**Underserved Middle-Income Nonmetropolitan Geographies:** A nonmetropolitan middle-income geography will be designated as underserved if it meets criteria for population size, density, and dispersion indicating the area's population is sufficiently small, thin, and distant from a population center that the tract is likely to have difficulty financing the fixed costs of meeting essential community needs.

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

**Urban Area:** All territories, populations, and housing units in urbanized areas and in places of 2,500 or more persons outside urbanized areas. More specifically, "urban" consists of territory, persons, and housing units in places of 2,500 or more persons incorporated as cities, villages, boroughs (except in Alaska and New York), and towns (except in the New England states, New York, and Wisconsin).

"Urban" excludes the rural portions of "extended cities"; census designated place of 2,500 or more persons; and other territory, incorporated or unincorporated, including in urbanized areas.



## CRA PUBLIC FILE 2025

**§ 345.43 Content and availability of public file.**

(a) *Information available to the public.* A bank shall maintain a public file that includes the following information:

- 3) A list of the bank's branches, their street addresses, and census tracts.

<b>Branch</b>	<b>Street Address</b>	<b>Census Tracts</b>
Bellaire	426 34 <sup>th</sup> St., Bellaire, OH 43906	39-013-0115.00
St. Clairsville	215 West Main St., St. Clairsville, OH 43950	39-013-0123.00
Powhatan	298 Highway 7, Powhatan Point, OH 43942	39-013-0110.00
Barnesville	915 East Main St., Barnesville, OH 43713	39-013-0109.02

# Locations



Bellaire



St. Clairsville



Powhatan Point



Barnesville

# Bellaire



426 34<sup>th</sup> Street  
Bellaire, OH 43906  
(740) 676-1165

## Lobby / Drive-Thru Hours: (Saturday Drive Up Only)

Monday - Thursday	8:30 AM - 4:30 PM
Friday	8:30 AM - 5:00 PM
Saturday	9:00 AM to Noon
Sunday	CLOSED

*ATM is available at this location.*

# St. Clairsville



PO Box 71  
215 West Main Street  
St. Clairsville, OH 43950  
(740) 695-0140

## Lobby / Drive-Thru Hours:

(Saturday Drive Up Only)

Monday - Thursday	8:30 AM - 4:30 PM
Friday	8:30 AM - 5:00 PM
Saturday	9:00 AM to Noon
Sunday	CLOSED

*ATM is available at this location.*

# Powhatan Point



PO Box 130  
298 Highway 7  
Powhatan Point, OH 43942  
(740) 795-4565

## Lobby/Drive-Thru Hours: (Saturday Drive-Up only)

Monday - Thursday	8:30 AM - 4:30 PM
Friday	8:30 AM - 5:00 PM
Saturday	9:00 AM - Noon
Sunday	CLOSED

*ATM is available at this location.*

# Barnesville



PO Box 230  
915 East Main Street  
Barnesville, OH 43713  
(740) 425-1901

## Lobby / Drive-Thru Hours: (Saturday Drive Up Only)

Monday - Thursday	8:30 AM - 4:30 PM
Friday	8:30 AM - 5:00 PM
Saturday	9:00 AM to Noon
Sunday	CLOSED

*ATM is available at this location.*





## CRA PUBLIC FILE 2025

**§ 345.43 Content and availability of public file.**

(a) *Information available to the public.* A bank shall maintain a public file that includes the following information:

(4) A list of branches opened or closed by the bank during the current year (updated on a quarterly basis for the prior quarter by March 31, June 30, September 30, and December 31) and each of the prior two calendar years, their street addresses, and census tracts;

*No branches have been opened or closed in 2024.*

*In 2023, the Bellaire Branch was moved from the Corporate Office located at 3301 Guernsey Street, Bellaire, Ohio, to its current location at 426 34<sup>th</sup> Street, Bellaire, Ohio.*

<b>Branch</b>	<b>Street Address</b>	<b>Census Tracts</b>
Bellaire	426 34 <sup>th</sup> St., Bellaire, OH 43906	39-013-0115.00
St. Clairsville	215 West Main St., St. Clairsville, OH 43950	39-013-0123.00
Powhatan	298 Highway 7, Powhatan Point, OH 43942	39-013-0110.00
Barnesville	915 East Main St., Barnesville, OH 43713	39-013-0109.02



## CRA PUBLIC FILE 2025

### § 345.43 Content and availability of public file.

(a) *Information available to the public.* A bank shall maintain a public file that includes the following information:

(5) A list of retail banking services (including hours of operation, available loan and deposit products, and transaction fees) generally offered at the bank's branches and descriptions of material differences in the availability or cost of services at particular branches, if any. A bank may elect to include information regarding the availability of other systems for delivering retail banking services (for example, mobile or online banking, loan production offices, and bank-at-work or mobile branch programs);

Following is a list of retail banking services available at all branches. There are no transaction fees associated with these services.

# Checking Accounts

## Kasasa Checking

Great news... we have a checking account that pays YOU! Plus, you can get free rewards, refunds on ATM withdrawal fees nationwide, AND earn cash back, with no monthly maintenance fee. All it takes are a few (super simple) banking basics. And these are just our checking accounts.

## Value Checking

If you are just getting started on your own or you are switching banks, our Value Checking account is for you. Enjoy benefits of unlimited check writing, using your Visa Debit Card to make purchases & ATM withdrawals, free online banking and bill pay - all while earning a great rate of interest.

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## Money Market Plus

Take advantage of some of our highest rates while maintaining liquidity. You can also access your money up to six times per month for free, so your money is always within reach!

# Kasasa Accounts

There's a new standard in checking. That's why we believe checking should be FREE, and REWARDING! It's time you had an account that pays you.

## Kasasa Cash

- High Interest Checking
- 2.50% APY on balances up to and including \$10,000
- .10% APY on balances over \$10,000

- .05% APY if you do not qualify for the month
- Refunds on ATM Withdrawal Fees, nationwide up to \$25 per month
- No Minimum Balance to open and earn rewards
- No Monthly Maintenance Fee

### **Kasasa Cash Back**

- 3.00% cash back on debit card purchases
- Earn cash back when you spend up to \$300 per month
- Earn up to \$9 per month, \$108 per year
- Refunds on ATM Withdrawal Fee, nationwide up to \$25 per month
- No Minimum Balance to open and earn rewards
- No Monthly Maintenance Fee

### **Kasasa Tunes**

- Get up to \$20 in iTunes, Google Play, and Amazon.com purchases when you open your account
- Get up to \$10 back on iTunes, Google Play, and Amazon.com purchases monthly
- Refunds on ATM Withdrawal Fees, nationwide up to \$25 per month
- No Minimum Balance to open and earn rewards
- No Monthly Maintenance Fee

### **Qualifying is easy\***

### **All 3 of our Kasasa Accounts have the following qualifiers:**

1. Make 12 Debit Card Purchases per month
2. Be enrolled and log onto Online Banking one time per month
3. Be enrolled in and agree to receive E-Statements

Don't qualify, no problem start again next month!

# Savings Accounts

## Statement Savings

Start a savings program with our Statement Savings account, and you're on your way to meeting your goals. Start by setting up an automatic transfer from any Belmont Savings Bank checking account. Savings accounts are also a great way to teach children about money.

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## Golden Savings

Looking to earn a higher rate of interest and still enjoy the liquidity of a savings account? The Golden Savings will earn you a higher rate for balances exceeding \$75,000.00.

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## Christmas Club

Open a Christmas Club to save for your holiday shopping this year! Small deposits in branch, online or via automatic transfer will build up in no time for a little extra holiday cheer. Interest credits at maturity and checks are mailed in October. Just in time for shopping!

## Kasasa Saver

**KASASA SAVER** - well - works like a savings account - but not really. That's right, it's designed to help you save money!

This FREE account takes the rewards you earn in your [Kasasa Cash](#) or [Cash Back](#) account and ATM fee refunds and automatically deposits them into your Kasasa Saver Account, then additional interest is piled on top. Saving money has never been so easy.

### KASASA SAVER WITH CASH

- High interest-bearing account

- A [Kasasa Cash account](#) is required to have a Kasasa Saver with Cash account
- APY ranges from 2.0%-0.70% depending on the balance in the account
- Earn 2.00% APY on balances up to and including \$50,000
- Balances over \$50,000 earn 0.20% APY
- If qualifications are not met, you will still earn 0.05% APY

#### KASASA SAVER WITH CASH BACK

- High interest-bearing account
- A [Kasasa Cash Back](#) account is required to have a Kasasa Saver with Cash Back account
- APY ranges from 2.0%-0.70% depending on the balance in the account
- Earn 2.00% APY on balances up to and including \$50,000
- Balances over \$50,000 earn 0.20% APY
- If qualifications are not met, you will still earn 0.05% APY

## Certificates of Deposit

Times Have Changed. Reliable Banking Has Not.

Penalty may be imposed for early withdrawal. Fees may reduce earnings. Subject to change without notice. Member FDIC.

# Individual Retirement Accounts

IRAs are designed to provide you with long-term tax-advantaged savings for retirement. You can choose between a Traditional IRA, a Roth IRA or an Educational IRA. Each option has particular features that allow you to make the most of your tax savings and both are FDIC insured to the maximum permitted by law. Speak with a Belmont Savings Bank representative to learn more about our options and to determine which IRA type is right for your financial goals.

## Traditional IRA\*

- Contributions may be tax-deductible
  - Earns tax-sheltered interest until distribution
- 

## Roth IRA\*

- Provides for taxable contributions, but tax-free distributed earnings
  - Offers the flexibility of early withdrawal without penalty under certain circumstances
- 

## Educational IRA\*

- Tax-free withdrawals for qualified educational expenses
- Contribute up to \$2,000 per year until the child reaches the age of 18

*\* Always consult with your tax advisor*

# Debit & Credit Cards

FREE with every checking account, a Belmont Savings Bank Visa® Debit Card is a card that works like a check, only better.

- Pay for EVERYTHING quickly and easily!
- Use your Visa® Debit Card everywhere Visa® is accepted!
- BSB Digital Wallet
- Pay bills online with secure chip technology
- 24-hour fraud protection...compliments of Belmont Savings Bank.

## **BSB Digital Wallet**

Pay on the go with Apple Pay, Google Pay, or Samsung Pay... simply by using your mobile device when you check out.

## Personal Credit Cards

You chose to bank with us for a reason, and we're giving you one more. Our Platinum credit cards offer hometown convenience, worldwide acceptance and great benefits. Increase your purchasing power with our personal credit cards and enjoy several great benefits.

# Online & Mobile Banking Services

## Online Banking

Too busy to visit a branch office? Our Online Banking service gives you an easy and convenient way to manage your accounts 24 hours a day, 7 days a week! Bank on your schedule and enjoy these features and benefits:

- 24 hour access to all your Belmont Savings Bank accounts
- Review account history, balances and retrieve check images
- Transfer funds anytime
- Bill Payments
- Make mortgage, home equity or personal loan payments
- Access to Personal Financial Management tools
- State-of-the-art security and encryption that keeps your information safe

## Online BillPay

Writing checks, the high cost of postage, and trips to the post office, make paying bills the old way both inefficient and expensive. Take advantage of Belmont Savings Bank's free Bill Pay service.

- Make an unlimited number of Bill Payments - for free!
- Enroll online or enroll at any of our offices



- It's fast, easy, and free. Pay today or schedule a payment for a date in the future. The payment amount will be deducted from your checking account and sent safely and securely to its destination.

To start enjoying the benefits of Online Banking and Bill Pay, choose the online enrollment link below

## Mobile Banking

### *BSB Mobile Banking Features:*

- Check account balances
- View transactions
- Transfer funds between accounts
- Pay bills
- View eStatements
- Find Belmont Savings Bank locations
- Deposit checks directly from your phone with Mobile Deposit
- Fingerprint login
- Instant Balance function

For assistance with BSB mobile banking, please call 740-676-1165 Monday through Thursday, from 8:30 a.m. – 4:30 p.m., Friday 8:30 a.m. – 5:00 p.m., and Saturday 9 a.m. – 12 p.m.

\*The BSB mobile app is available to Belmont Savings Bank's **Online Banking** customers. The BSB mobile app is available on iPhone® and Android™. Subject to availability requirements. iPhone® is a federally registered trademark of Apple Inc. Android™ is a trademark of Google Inc. Apple Inc. and Google Inc. are not Equal Housing Lenders or Members of the FDIC.

## BSB Digital Wallet

With BSB Digital Wallet you can leave your purse or wallet at home and make payments with your smartphone. Digital Wallet is a convenient way for you to make easy in-store payments with your debit card or credit card directly from your mobile device. [Learn how to link your debit card to Digital Wallet.](#)

Zelle® is available right from your online and mobile banking account and conveniently located in the same place where you pay your bills.

It is easy to get started. Simply log in to your online banking account or mobile banking app and enroll in Bill Pay. Once your account is verified, return to Bill Pay and select the "**Send Money With Zelle®**" tab.

Enroll in Zelle® and start sending and receiving money with friends and family!

## Mortgage Loans

### Mortgage Loans

Buying or refinancing a home can be one of the most expensive (but rewarding) purchases you'll ever make. Our team of local experts will help you find the mortgage that best suits your homeownership goals. We offer Fixed or Adjustable rates with a variety of terms in Barnesville, Bellaire, St. Clairsville, Powhatan, Wheeling, and throughout the Ohio Valley. The servicing of your loan will always be kept local.

## Personal Loans

Belmont Savings Bank knows that your personal financial situation can change throughout life. When it does, you can count on us to help you manage your situation. With our experienced lending team, let us guide you into the product that fits your needs.

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## **CDL Loan Program - Available only at Belmont College**

You can easily apply for a loan in the CDL Program at Belmont College through our easy application process!

### Auto Loans

Are you looking to purchase a vehicle? Stop by any of our locations to discuss financing options for new and used auto loans.

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### Personal Loans

If you are ready to finance some aspect of your life, Belmont Savings Bank wants you to know that you can count on us for a personal loan that may provide the financial boost you need.

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### Passbook Loans

Our Passbook Loans are a great, low cost way to obtain the funds you need. You can borrow up to 90% of the amount you have on deposit in your Certificate of Deposit account.

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### Home Equity Lines of Credit

With our Home Equity Line of Credit, you can borrow funds for any of your needs using the equity established in your home as collateral.

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### Property Improvement Loans

As a homeowner, there are moments when you need to replace, upgrade or renovate your home. We can accommodate your needs through a Property Improvement Loan.

# Business Banking Solutions

Belmont Savings Bank strives to be your business' full service partner. Our experienced team makes it their goal to understand the challenges your company faces and customize a solution to overcome those obstacles. We offer the advantage of local decisions and lower fees compared to other banking options.

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- Business Online Banking/Bill Pay
- Business Debit Card
- e-Statement
- Mobile Banking
- ACH Origination
- Remote Deposit Capture
- QuickBooks Interface
- Wire Transfers
- Merchant Services
- Business Credit Card
- Payroll + HR Solutions

## **Business Lending**

We offer all of the services to help you to continue to grow your business. Whether your just getting started, or you've been around for many years, our experienced lending team has the knowledge to help you!



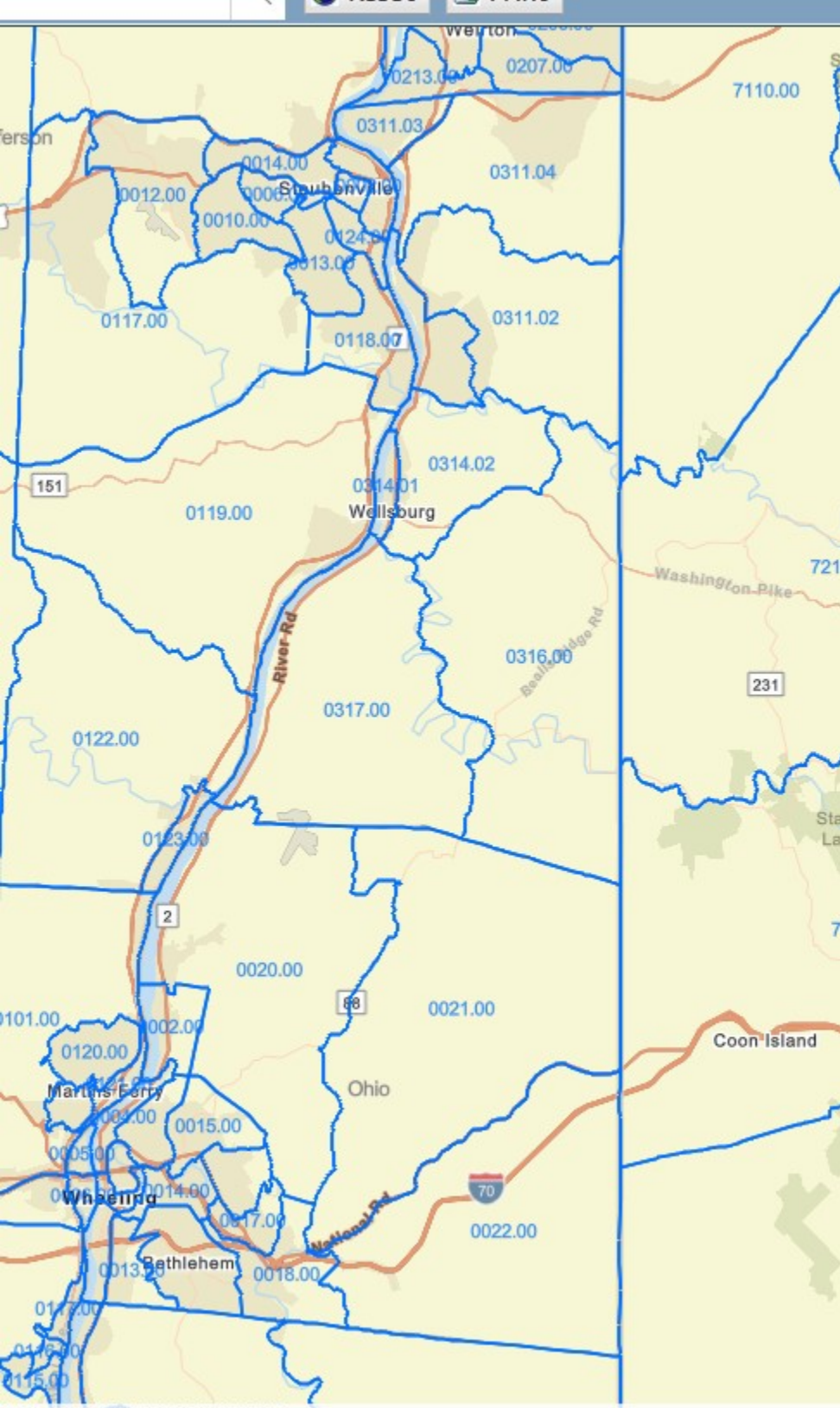
## **CRA PUBLIC FILE 2025**

**§ 345.43 Content and availability of public file.**

(a) *Information available to the public.* A bank shall maintain a public file that includes the following information:

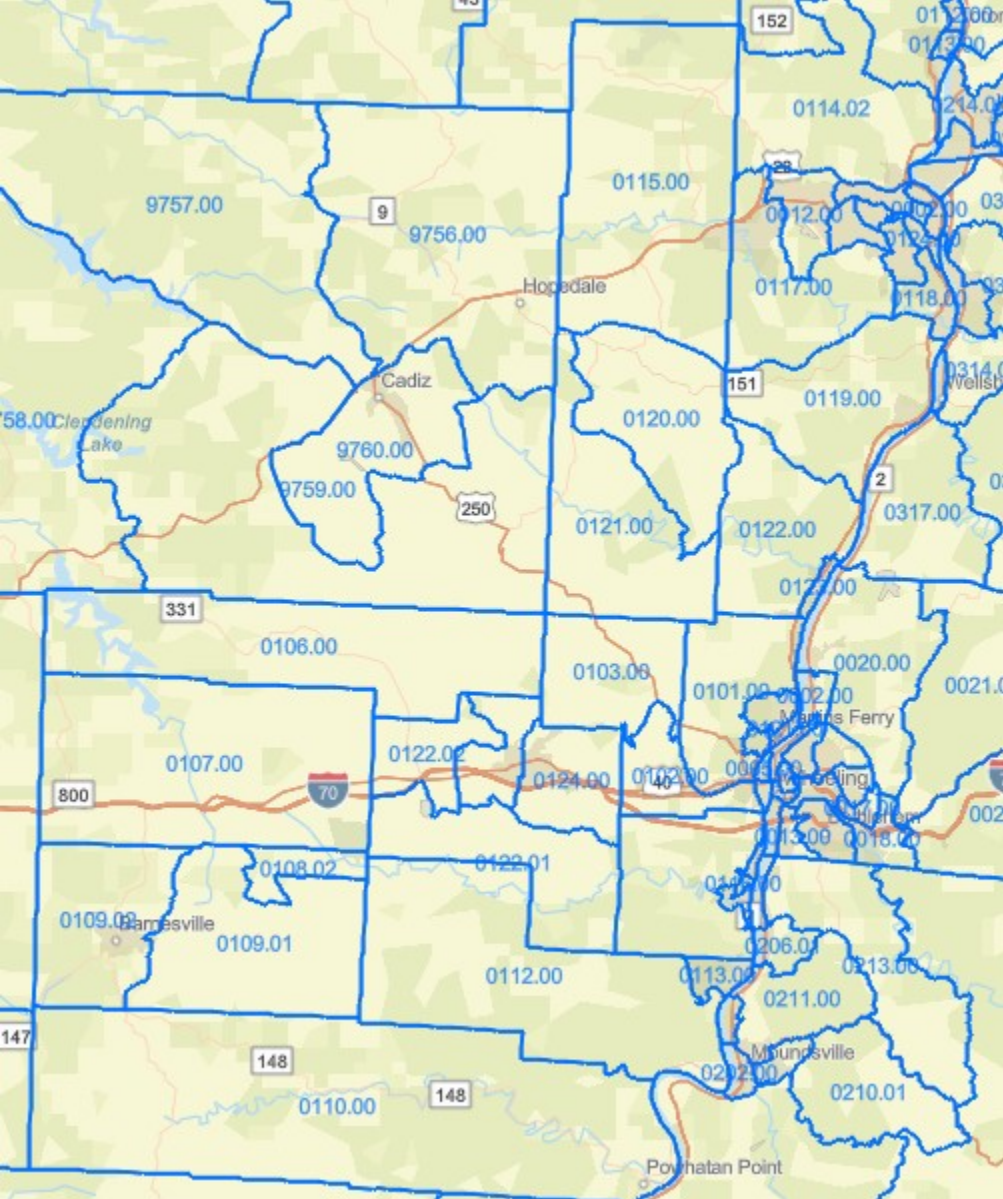
- 6) A map of each facility-based assessment area and, as applicable, each retail lending assessment area showing the boundaries of the area and identifying the census tracts contained in the area, either on the map or in a separate list; and

*The Bank's Assessment area includes Belmont County in Ohio and Ohio County in West Virginia.*



Ohio County, WV Assessment Area

Belmont County, Ohio  
Assessment Area





2024 FFIEC Census Report - Summary Census Demographic Information

MSA/MD: 48540 - WHEELING, WV-OH

State: All States



State Code	County Code	Tract Code	Tract Income Level	Distressed or Underserved Tract	Tract Median Family Income %	2024 FFIEC Est.MSA/MD non-MSA/MD Median Family Income	2024 Est. Tract Median Family Income	2020 Tract Median Family Income	Tract Population	Tract Minority %	Minority Population	Owner Occupied Units	1- to 4-Family Units
39	013	0101.00	Middle	No	91.83	\$80,600	\$74,015	\$60,250	3733	8.87	331	1308	2045
39	013	0102.00	Middle	No	83.33	\$80,600	\$67,164	\$54,671	3516	11.15	392	1108	1904
39	013	0103.00	Middle	No	103.85	\$80,600	\$83,703	\$68,138	3401	4.68	159	1298	1603
39	013	0106.00	Middle	No	103.52	\$80,600	\$83,437	\$67,917	3540	5.59	198	1089	1969
39	013	0107.00	Middle	No	117.06	\$80,600	\$94,350	\$76,806	2687	7.11	191	755	1200
39	013	0108.02	Moderate	No	76.90	\$80,600	\$61,981	\$50,455	2162	4.02	87	603	975
39	013	0109.01	Upper	No	134.52	\$80,600	\$108,423	\$88,261	1733	2.65	46	457	666
39	013	0109.02	Moderate	No	79.71	\$80,600	\$64,246	\$52,301	4875	5.37	262	1595	2212
39	013	0110.00	Middle	No	106.69	\$80,600	\$85,992	\$70,000	4770	4.34	207	1417	2393
39	013	0112.00	Middle	No	109.55	\$80,600	\$88,297	\$71,875	3167	5.81	184	1097	1582
39	013	0113.00	Middle	No	99.20	\$80,600	\$79,955	\$65,087	3696	4.63	171	1267	1870
39	013	0114.00	Moderate	No	78.48	\$80,600	\$63,255	\$51,490	4292	6.41	275	1433	1773
39	013	0115.00	Moderate	No	78.59	\$80,600	\$63,344	\$51,563	1435	10.31	148	471	828
39	013	0116.00	Moderate	No	69.02	\$80,600	\$55,630	\$45,286	1151	16.68	192	284	552
39	013	0117.00	Moderate	No	62.11	\$80,600	\$50,061	\$40,750	1285	17.20	221	176	760
39	013	0119.00	Middle	No	102.64	\$80,600	\$82,728	\$67,340	2786	12.46	347	758	1403
39	013	0120.00	Middle	No	83.35	\$80,600	\$67,180	\$54,688	2459	15.53	382	540	943
39	013	0121.00	Moderate	No	78.11	\$80,600	\$62,957	\$51,250	1128	14.45	163	374	589
39	013	0122.01	Middle	No	108.60	\$80,600	\$87,532	\$71,250	1810	5.08	92	531	757
39	013	0122.02	Upper	No	133.71	\$80,600	\$107,770	\$87,724	4469	26.96	1205	623	773
39	013	0123.00	Upper	No	133.09	\$80,600	\$107,271	\$87,321	4078	7.99	326	1085	1654
39	013	0124.00	Upper	No	136.08	\$80,600	\$109,680	\$89,281	4324	8.83	382	1343	1925
54	051	0202.00	Moderate	No	59.27	\$80,600	\$47,772	\$38,889	1806	6.20	112	762	1322
54	051	0205.00	Moderate	No	70.66	\$80,600	\$56,952	\$46,364	991	11.81	117	307	520
54	051	0206.01	Middle	No	82.40	\$80,600	\$66,414	\$54,063	2177	6.48	141	628	1084
54	051	0207.02	Upper	No	123.08	\$80,600	\$99,202	\$80,750	1384	6.21	86	534	652

\* Will automatically be included in the 2025 Distressed or Underserved Tract List



State Code	County Code	Tract Code	Tract Income Level	Distressed or Underserved Tract	Tract Median Family Income %	2024 FFIEC Est.MSA/MD non-MSA/MD Median Family Income	2024 Est. Tract Median Family Income	2020 Tract Median Family Income	Tract Population	Tract Minority %	Minority Population	Owner Occupied Units	1- to 4-Family Units
54	051	0208.00	Middle	No	88.81	\$80,600	\$71,581	\$58,269	4183	5.00	209	881	2293
54	051	0209.00	Middle	No	86.86	\$80,600	\$70,009	\$56,987	5049	5.74	290	1258	2167
54	051	0210.01	Low	No	44.29	\$80,600	\$35,698	\$29,063	1474	5.90	87	480	634
54	051	0210.02	Middle	No	91.50	\$80,600	\$73,749	\$60,032	4487	6.24	280	1896	2264
54	051	0211.00	Middle	No	99.69	\$80,600	\$80,350	\$65,409	4830	5.67	274	1607	2395
54	051	0213.00	Middle	No	103.78	\$80,600	\$83,647	\$68,092	4210	7.74	326	1623	1947
54	069	0002.00	Middle	No	86.01	\$80,600	\$69,324	\$56,429	3284	10.35	340	881	1483
54	069	0003.00	Middle	No	108.34	\$80,600	\$87,322	\$71,083	1664	16.47	274	455	705
54	069	0004.00	Unknown	No	0.00	\$80,600	\$0	\$0	958	22.44	215	204	445
54	069	0005.00	Moderate	No	78.11	\$80,600	\$62,957	\$51,250	1359	19.87	270	283	644
54	069	0006.00	Moderate	No	50.45	\$80,600	\$40,663	\$33,103	1025	25.76	264	262	661
54	069	0007.00	Moderate	No	57.71	\$80,600	\$46,514	\$37,868	879	35.49	312	119	389
54	069	0013.00	Middle	No	92.54	\$80,600	\$74,587	\$60,714	1220	6.31	77	446	650
54	069	0014.00	Upper	No	151.74	\$80,600	\$122,302	\$99,554	2969	11.75	349	750	1064
54	069	0015.00	Upper	No	129.26	\$80,600	\$104,184	\$84,808	2647	11.79	312	628	1018
54	069	0016.00	Middle	No	87.75	\$80,600	\$70,727	\$57,571	2313	7.83	181	668	1088
54	069	0017.00	Upper	No	127.65	\$80,600	\$102,886	\$83,750	1679	8.28	139	615	739
54	069	0018.00	Middle	No	115.16	\$80,600	\$92,819	\$75,556	5148	11.13	573	1699	2387
54	069	0019.01	Upper	No	130.64	\$80,600	\$105,296	\$85,714	2565	7.25	186	895	1043
54	069	0020.00	Upper	No	163.85	\$80,600	\$132,063	\$107,500	4922	7.07	348	1660	1848
54	069	0021.00	Middle	No	100.50	\$80,600	\$81,003	\$65,938	3846	7.20	277	851	1440
54	069	0022.00	Middle	No	102.44	\$80,600	\$82,567	\$67,212	2743	7.11	195	771	1122
54	069	0026.00	Moderate	No	50.63	\$80,600	\$40,808	\$33,218	2208	16.17	357	409	1200
54	069	0027.00	Moderate	No	66.89	\$80,600	\$53,913	\$43,889	996	19.78	197	61	285

\* Will automatically be included in the 2025 Distressed or Underserved Tract List



## CRA PUBLIC FILE 2025

### § 345.43 Content and availability of public file.

(a) *Information available to the public.* A bank shall maintain a public file that includes the following information:

(7) Any other information the bank chooses.

### *(b) Additional information available to the public —*

(2) Banks required to report HMDA data —

(i) HMDA Disclosure Statement. A bank required to report home mortgage loan data pursuant to [12 CFR part 1003](#) must include in its public file a written notice that the bank's HMDA Disclosure Statement may be obtained on the Consumer Financial Protection Bureau's (CFPB's) website at: <https://www.consumerfinance.gov/hmda>. In addition, if the FDIC considered the home mortgage lending of a bank's operating subsidiaries or, at a bank's election, the FDIC considered the home mortgage lending of other bank affiliates, the bank must include in its public file the names of the operating subsidiaries and the names of the affiliates and a written notice that the operating subsidiaries' and other affiliates' HMDA Disclosure Statements may be obtained at the CFPB's website. The bank must include the written notices in the public file within three business days after receiving notification from the FFIEC of the availability of the disclosure statements.

# Home Mortgage Disclosure Act Notice

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

These data are available online at the Consumer Financial Protection Bureau's Web site ([www.consumerfinance.gov/hmda](http://www.consumerfinance.gov/hmda)).

HMDA data for many other financial institutions are also available at this Web site.



## **CRA PUBLIC FILE 2025**

### **§ 345.43 Content and availability of public file.**

(a) *Information available to the public.* A bank shall maintain a public file that includes the following information:

(8) Additional Information:

(3) Small banks. A small bank, or a bank that was a small bank during the prior calendar year, must include in its public file the bank's loan-to-deposit ratio for each quarter of the prior calendar year and, at its option, additional data on its loan-to-deposit ratio.

FDIC Certificate # 28348  
 OCC Charter # 0  
 Public Report

FRB District/ID\_RSSD 4 / 72678  
 County: BELMONT

BELMONT SAVINGS BANK; BELLAIRE, OH  
 Liquidity & Funding--Page 10

Liquidity & Funding  
 03/20/2025 04:58:23 PM

	12/31/2024			09/30/2024			06/30/2024			03/31/2024			12/31/2023		
	BANK	PG 5	PCT	BANK	PG 5	PCT	BANK	PG 5	PCT	BANK	PG 5	PCT	BANK	PG 5	PCT
Percent of Total Deposits															
Individ, Partnerships, and Corp.	89.87	87.96	56	89.76	88.26	54	91.98	88.23	64	93.15	88.25	70	93.17	88.32	70
U.S. Govt, States & Political Sub in U.S.	10.13	10.78	49	10.24	10.47	51	8.02	10.44	41	6.85	10.40	35	6.83	10.33	35
Comml Banks & Other Dep Inst. in U.S.	0.00	0.53	40	0.00	0.55	40	0.00	0.59	39	0.00	0.57	41	0.00	0.57	41
Banks in Foreign Countries	0.00	0.01	99	0.00	0.01	99	0.00	0.01	99	0.00	0.01	99	0.00	0.01	99
Foreign Govts and Official Inst.	0.00	0.00	99	0.00	0.00	99	0.00	0.00	99	0.00	0.03	99	0.00	0.04	98
Total deposits	100.00	100.00	89	100.00	100.00	89	100.00	100.00	89	100.00	100.00	90	100.00	100.00	88
Domestic Demand Deposits	16.56	25.42	21	17.68	25.33	25	17.22	25.53	23	17.59	25.45	24	18.29	25.96	26
Domestic Other Transaction Accts	0.00	11.65	11	0.01	11.45	11	0.01	11.77	10	0.01	12.18	10	0.01	12.22	10
Domestic Nontransaction Accts	83.44	60.70	90	82.31	61.03	89	82.77	60.59	89	82.40	60.11	89	81.70	59.67	88
Total Domestic Deposits	100.00	100.00	99	100.00	100.00	99	100.00	100.00	99	100.00	100.00	99	100.00	100.00	99
Deposits in Foreign Offices	0.00	0.00	99	0.00	0.00	99	0.00	0.00	99	0.00	0.00	99	0.00	0.00	99
Total Deposits	100.00	100.00	99	100.00	100.00	99	100.00	100.00	99	100.00	100.00	99	100.00	100.00	99
Liquidity/Funding Ratios															
Net Non Core Fund Dep \$250M	31.91	6.81	95	32.38	7.31	95	33.03	7.72	96	32.39	6.69	96	29.47	7.26	94
Core Deposits	58.45	75.43	7	56.65	74.70	6	56.95	75.27	6	57.87	75.67	6	59.56	76.02	8
Short Term Non Core Funding	22.30	10.58	92	24.92	10.70	95	23.31	10.65	94	22.49	10.42	93	16.98	10.10	84
S.T Inv to S.T. Ncore Fund	3.01	108.02	2	2.33	101.52	1	2.58	95.24	1	2.65	108.41	1	7.82	108.18	7
S.T. Asset to S.T. Liabilities	5.21	107.82	0	3.90	103.63	0	3.68	101.43	0	4.51	106.69	0	5.76	107.36	0
Net S.T. Liabilities to Assets	34.60	1.58	98	36.94	2.10	99	35.44	2.44	98	34.33	1.64	99	31.23	1.55	97
<b>Net Loans &amp; Leases to Deposits</b>	<b>81.91</b>	<b>78.35</b>	<b>55</b>	<b>84.19</b>	<b>78.63</b>	<b>59</b>	<b>82.15</b>	<b>79.08</b>	<b>54</b>	<b>79.43</b>	<b>77.82</b>	<b>50</b>	<b>74.57</b>	<b>78.06</b>	<b>40</b>
Net LN&LS to Core Deposits	104.23	90.36	72	103.87	90.52	71	102.38	90.58	69	98.64	88.96	66	91.97	88.52	56
Brkr Dep Mat < 1 Yr to Brkr Deps	78.03	36.61	55	71.84	34.76	52	42.86	34.93	39	42.86	37.10	36	0.00	37.72	17
Brokered Deposits to Deposits	11.87	2.89	88	9.79	2.85	86	9.84	2.77	86	9.91	2.82	86	9.81	2.65	87
Listing Service Dep to Deposits	0.00	0.36	74	0.00	0.35	74	0.00	0.34	73	0.00	0.33	73	0.00	0.32	73
List Service and Brkrd Dep to Deps	11.87	3.63	85	9.79	3.57	82	9.84	3.48	83	9.91	3.55	82	9.81	3.37	83
Sec Bor + sec FFP to Tot Bor + FFP	0.00	2.39	83	58.65	8.59	85	67.65	10.96	84	71.30	12.59	82	70.36	12.00	84
Recip Brkrd Dep to Tot Brkrd Dep	0.00	6.18	80	0.00	5.97	80	0.00	5.47	81	0.00	5.12	82	0.00	4.75	82
Total Deposits															
Individ, Partnerships, and Corp.		344,651			325,664			327,204			328,929			332,461	
U.S. Govt, States & Political Sub in U.S.		38,849			37,172			28,548			24,199			24,353	
Comml Banks & Other Dep Inst. in U.S.		0			0			0			0			0	
Banks in Foreign Countries		0			0			0			0			0	
Foreign Govts and Official Inst.		0			0			0			0			0	
Total Deposits		383,500			362,836			355,752			353,128			356,814	
Domestic Demand Deposits		63,506			64,153			61,248			62,132			65,257	
Domestic Other Transaction Accts		0			31			40			28			23	
Domestic Nontransaction Accts		319,994			298,652			294,464			290,968			291,534	
Total Domestic Deposits		383,500			362,836			355,752			353,128			356,814	
Deposits in Foreign Offices		N/A			N/A			N/A			N/A			N/A	
Total Deposits		383,500			362,836			355,752			353,128			356,814	
Other Liquidity/Funding Data															
Non Core Liabilities \$250M		152,183			156,015			152,973			146,640			134,413	
Short Term Non Core Funding		114,959			129,377			116,854			110,517			82,474	
Core Deposits		301,368			294,115			285,447			284,340			289,342	
Time Deps \$250M & Under Mat < 1 Yr		108,754			95,699			82,571			81,109			78,525	
Time Deps \$250M & Under Mat > 1 Yr		17,496			18,331			29,271			30,540			31,901	
Time Deps over \$250M Mat < 1 Yr		34,442			31,625			34,240			32,725			30,596	
Time Deps over \$250M Mat > 1 Yr		2,181			1,589			1,065			1,064			1,876	
Fed Home Loan Bor Mat < 1 Yr		33,989			16,850			10,165			6,165			3,990	

Fed Home Loan Bor Mat > 1 Yr	25,000	15,000	15,000	15,000	15,000
Other Borrowing Mat < 1 Year	0	45,239	52,739	52,739	45,239
Other Borrowing Mat > 1 Year	43	49	54	59	63
Secured Other Borrowings	0	45,239	52,739	52,739	45,239
Federal Funds Purchased	0	0	0	0	0
Secured Fed Funds Purchased	0	0	0	0	0
Listing Service Deposits	0	0	0	0	0
Brokered Deposits	45,509	35,509	35,000	35,000	35,000
Reciprocal Brokered Deposits	0	0	0	0	0