



Community Reinvestment Act (“CRA”) Public File

In accordance with the Community Reinvestment Act Regulation, §228.43, Old Dominion National Bank (“the Bank”) is required to maintain and, upon request, make available for public inspection a complete Community Reinvestment Act Public File. The Public File is maintained on the Bank’s website for public inspection. Request a paper copy at a Bank branch location for no charge.

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PUBLIC DISCLOSURE

May 27, 2025

COMMUNITY REINVESTMENT ACT PERFORMANCE EVALUATION

Old Dominion National Bank
Charter Number: 24730

4916 Plank Road, Suite 216
North Garden, Virginia 22959

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

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

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Overall CRA Rating

Institution's CRA Rating: This institution is rated Satisfactory

The Lending Test is rated: Satisfactory

The Community Development Test is rated: Satisfactory

The major factors that support this rating include:

- The Lending Test rating for Old Dominion National Bank (hereinafter referred to as ODNB or bank) is based on lending performance in full- and limited-scope assessment areas (AAs) in the state of Virginia, and the full-scope AA in the state of Pennsylvania.
 - The bank's loan-to-deposit (LTD) ratio is more than reasonable considering the bank's size, financial condition, and credit needs in its AAs.
 - A majority of the bank's loans were originated or purchased inside the bank's AAs.
 - The bank exhibits reasonable geographic distribution of loans in the bank's AAs.
 - The bank exhibits reasonable distribution of loans to individuals of different income levels and businesses of different sizes in the bank's AAs, given the product lines offered by the bank.
- The Community Development (CD) Test rating is based on CD activities in the full- and limited-scope AAs in the state of Virginia, and the full-scope AA in the state of Pennsylvania.
 - CD lending, investments and services reflects adequate responsiveness to the needs of the bank's AAs.

Loan-to-Deposit Ratio

Considering the bank's size, financial condition, and credit needs of the AAs, the bank's LTD ratio was more than reasonable.

ODNB's LTD ratio is calculated on a bank-wide basis for the quarters June 30, 2022, through December 31, 2024. The bank's average quarterly LTD ratio for the 11 consecutive quarters since the previous CRA evaluation is 102.6 percent. This is above the average quarterly LTD ratio of 78.6 percent for similarly situated banks in the AAs. The bank's average quarterly LTD ratios ranged from high of 108.1 percent to a low of 90.1 percent. The average quarterly LTD ratio of similarly situated banks in the AAs ranged from a high of 101.6 percent to a low of 27.0 percent.

Lending in Assessment Area

A majority of the bank's loans were inside its AAs.

The bank originated and purchased 69.5 percent of its total loans inside the bank's AAs during the evaluation period. This analysis is performed at the bank, rather than the AA, level. This percentage does not include extensions of credit by affiliates that may be considered under the other performance criteria.

Table 1: Lending Inside and Outside of the Assessment Area										2022 - 2024
Loan Category	Number of Loans				Total #	Dollar Amount of Loans \$(000s)				Total \$(000s)
	Inside		Outside			Inside		Outside		
	#	%	#	%		\$	%	\$	%	
Home Mortgage	333	67.41	161	32.59	494	335,204	74.92	112,206	25.08	447,409
Small Business	164	74.21	57	25.79	221	65,738	73.52	23,681	26.48	89,419
Total	497	69.51	218	30.49	715	400,942	74.69	135,887	25.31	536,828
Source: 1/1/2022 - 12/31/2024 Bank Data.										
Due to rounding, totals may not equal 100.0%										

Description of Institution

ODNB is a federally chartered bank headquartered in North Garden, Virginia. The bank is wholly owned by ODNB Financial Corporation, a one bank holding company, headquartered in Tysons Corner, Virginia. As of December 31, 2024, ODNB reported total assets of \$1.4 billion, and tier 1 capital of \$153.9 million.

ODNB has two state rating areas for this evaluation period which include the states of Virginia and Pennsylvania. There are two AAs in the state of Virginia – Charlottesville, VA Metropolitan Statistical Area (MSA) (Charlottesville VA MSA), and Washington-Baltimore-Arlington, DC-VA-MD-WV-PA Combined Statistical Area (CSA) (Washington CSA). There is one AA in the state of Pennsylvania – State College PA MSA.

The bank is a multistate institution with six branches. Four branches are located in the state of Virginia, in Leesburg, North Garden, Scottsville, and Vienna. The bank has one branch in State College, Pennsylvania. The bank has five deposit taking automated teller machines (ATM) at the North Garden, Scottsville, Tysons Corner, Leesburg, and State College branch locations. The bank has two standalone ATMs at 1416 P Street, NW, Washington, D.C.

ODNB opened a full-service branch in a moderate-income census tract (CT) in Loudoun County, Virginia on March 4, 2024. This branch has an ATM but does not have a drive thru. ODNB opened a full-service branch in an upper-income CT in Palm Beach County, Florida on November 27, 2024, which does not have an ATM nor a drive thru. There was no merger or acquisition activity that affected the scope of the bank's operations during the evaluation period.

ODNB offers a full range of loan and deposit services. Offerings include a number of commercial products, such as commercial real estate loans, government contracting loans, healthcare loans, and non-profit organization loans. For consumers, ODNB offers residential mortgages and construction loans, home equity lines of credit (HELOC), and second mortgages. ODNB offers a number of personal and business deposit accounts. This includes deposit accounts, payment services, and treasury management services for businesses, not-for-profits, and professional practices.

The bank utilizes a variety of delivery channels for its products and services. In addition to standard brick and mortar services, the bank offers a full array of online banking services available at www.odnb.bank and www.centre1st.bank.

As of December 31, 2024, the bank's loan portfolio totaled \$1.2 billion, with total loans representing 85.46 percent of total assets. The Consolidated Report of Condition and Income (Call Report), as of December 31, 2024, reported that commercial and commercial real estate (business) loans represented the largest percentage of total loans at 65.3 percent followed by home mortgage loans (including multifamily loans),

farm loans, and consumer loans at 34.3, 0.3, and 0.1 percent, respectively. During the three-year evaluation period (2022 – 2024), based on bank loan production reports, 71.5 percent of the number of loans originated by number, were business loans followed by home mortgage, farm, and consumer at 28.0, 0.4, and 0.1 percent, respectively.

Lending focus has been on the Washington CSA, and the State College PA MSA, which explains the limited level of lending in the Charlottesville VA MSA during the evaluation period. Management continues efforts to increase lending in the Charlottesville VA MSA AA.

The bank was previously evaluated under the CRA on July 18, 2022, and received a “Satisfactory” rating. There are no legal, financial, or other factors impeding the bank’s ability to help meet the credit needs in its AAs during the evaluation period.

Scope of the Evaluation

Evaluation Period/Products Evaluated

The OCC evaluated the CRA performance of ODNB using Intermediate Small Bank performance criteria, which includes a lending test and CD test. The lending test evaluates the bank’s record of meeting the credit needs of its AAs through its primary lending products in home mortgage, and small loans to businesses. The CD test evaluates the bank’s responsiveness to CD needs in its AAs through CD lending, qualified investments, and services. The evaluation for both the lending and CD test is January 1, 2022, through December 31, 2024.

Small farm loans and multi-family loans were not considered in the lending test due to the low percentage of loan originations in all AAs.

Selection of Areas for Full-Scope Review

In each state where the bank has an office, one or more of AAs within that state was selected for a full-scope review. For purposes of this evaluation, bank delineated AAs located within the same metropolitan statistical area (MSA), multistate metropolitan statistical area (MMSA), or combined statistical area (CSA), if applicable are combined and evaluated as a single AA. Similarly, bank delineated non-MSA AAs within the same state are combined and evaluated as a single area. These combined AAs may be evaluated as full- or limited-scope. Refer to the “Scope” section under each State Rating for details regarding how full-scope AAs were selected. Refer to Appendix A, Scope of Examination, for a list of full- and limited-scope AAs.

Ratings

The bank’s overall rating is a blend of the state ratings.

The state of Virginia carried the heaviest weighting because it contained 56.1 percent of the bank’s deposits, 66.7 percent of total branch offices, and 56.8 percent of total loans originated during the evaluation period. The state of Pennsylvania held 14.5 percent of the bank’s total deposits, 16.7 percent of the total branch offices, and 34.9 percent of total loans originated during the evaluation period.

The state ratings in rating areas with a single AA are based on performance in that AA. The state ratings in rating areas with multiple AAs are based on the weighted-average conclusions in those AAs. Refer to the “Scope” section under each state for details regarding how the areas were weighted in arriving at the respective ratings.

Discriminatory or Other Illegal Credit Practices Review

Pursuant to 12 CFR 25.28(c) (March 29, 2024), in determining a national banks or federal savings association's (collectively, bank) CRA rating, the OCC considers evidence of discriminatory or other illegal credit practices in any geography by the bank, or in any AA by an affiliate whose loans have been considered as part of the bank's lending performance. As part of this evaluation process, the OCC consults with other federal agencies with responsibility for compliance with the relevant laws and regulations, including the U.S. Department of Justice, the U.S. Department of Housing and Urban Development, and the Consumer Financial Protection Bureau, as applicable.

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

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

State Rating

State of Virginia

CRA rating for the State of Virginia: Satisfactory

The Lending Test is rated: Satisfactory

The Community Development Test is rated: Outstanding

The major factors that support this rating include:

- The bank exhibits reasonable geographic distribution of loans in the bank's AAs.
- The bank exhibits reasonable distribution of loans to individuals of different income levels and businesses of different sizes in the bank's AAs, given the product lines offered by the bank.
- CD lending, investments, and services reflects excellent responsiveness to the needs of the bank's AAs.

Description of Institution's Operations in Virginia

ODNB identified Washington CSA AA, as an AA in the state of Virginia. The AA includes the District of Columbia; Prince George's County and Montgomery County in the state of Maryland; Arlington County, Fairfax County, Loudoun County, Prince William County, Alexandria City, Fairfax County, Falls Church City, Manassas City, and Manassas Park City in the state of Virginia for the years 2022, and 2023. The AA consisted of 1,231 CTs, consisting of 99 low-income geographies, 259 moderate-income geographies, 403 middle income geographies, 449 upper-income geographies, and 21 CTs not assigned an income level.

In 2024, ODNB changed the AA delineation by removing Montgomery County, Maryland and adding Jefferson County, West Virginia. This changed the total number of CTs to 1,014, consisting of 84 low-income geographies, 214 moderate-income geographies, 331 middle income geographies, 364 upper-income geographies, and 21 CTs not assigned an income level. The AA consisted of entire cities and counties and does not arbitrarily exclude low or moderate-income (LMI) tracts.

The bank has two full-service branches and two stand-alone, deposit-taking automated teller machines (ATMs) in the AA. The Tysons Corner branch offers drive-through services and an ATM and is located in an upper-income CT in Fairfax County. The Leesburg branch offers an ATM but no drive-through services and is located in a moderate-income CT in Loudoun County. The bank opened the Leesburg branch on March 4, 2024. Hours of operation for all branches is 9 a.m. to 5 p.m., Monday through Friday. No branches have Saturday hours. The two stand-alone, deposit-taking ATMs are located in the District of Columbia in an upper-income CT and offers 24 hours a day, 7 days a week service.

ODNB faces considerable competition in the Washington CSA AA, including some large, regional, and national institutions. According to FDIC Summary of Deposits as of June 30, 2024, ODNB ranked 22nd with a deposit market share of 0.44 percent, or \$840.4 million, among the 61 institutions in the Washington CSA AA. Capital One, National Association (N.A.), Bank of America, N.A., Wells Fargo Bank, N.A., Truist Bank, and PNC, N.A. are the bank's major competitors in the AA with deposit market share of 24.98, 18.15, 13.63, 10.82, and 5.44 percent, respectively.

According to 2023 Peer Mortgage data, the top 100 lenders originated 69,077 home mortgage loans in the AA. The top five home mortgage lenders in the AA were Navy Federal Credit Union, Pennymac Loan

Services, LLC, Truist Bank, Rocket Mortgage, and United Wholesale Mortgage, which held a combined loan market share of 24.4 percent in the AA.

Washington-Baltimore-Arlington, DC-MD-VA-WV-PA Combined Statistical Area

The following tables provide a summary of the demographics, including housing, business, and economic information for the Washington CSA AA.

Assessment Area(s) - Washington-Baltimore-Arlington, DC-MD-VA-WV-PA Combined Statistical Area						
2022 - 2023						
Demographic Characteristics	#	Low % of #	Moderate % of #	Middle % of #	Upper % of #	NA* % of #
Geographies (Census Tracts)	1,246	9.23	21.99	30.58	36.52	1.69
Population by Geography	5,326,885	8.69	22.60	31.61	36.43	0.67
Housing Units by Geography	1,995,700	9.09	22.12	32.01	36.22	0.57
Owner-Occupied Housing by Geography	1,160,038	4.07	17.92	33.80	44.01	0.21
Occupied Rental Units by Geography	724,999	16.61	28.25	29.67	24.42	1.05
Vacant Units by Geography	110,663	12.43	25.85	28.57	31.90	1.25
Businesses by Geography	289,735	5.08	19.71	32.74	41.49	0.98
Farms by Geography	5,579	4.07	19.32	33.46	42.93	0.22
Family Distribution by Income Level	1,205,315	21.47	16.42	19.78	42.33	0.00
Household Distribution by Income Level	1,885,037	22.86	16.03	18.97	42.14	0.00
Unemployment rate (%)	4.91	9.78	6.12	4.56	3.39	5.04
Households Below Poverty Level (%)	7.40	19.72	9.81	6.01	4.06	15.31
Median Family Income (23224 - Frederick-Gaithersburg-Bethesda, MD MD)		\$129,092	Median Housing Value			\$455,400
Median Family Income (47894 - Washington-Arlington-Alexandria, DC-VA-MD-WV MD)		\$126,224	Median Gross Rent			\$1,833
Median Family Income (23224 - Frederick-Gaithersburg-Bethesda, MD MD) for 2023		\$151,400	Families Below Poverty Level			5.12
Median Family Income (47894 - Washington-Arlington-Alexandria, DC-VA-MD-WV MD) for 2023		\$150,100				
FFIEC File - 2020 Census 2023 Dun & Bradstreet SBSF Demographics Due to rounding, totals may not equal 100.0% (* The NA category consists of geographies that have not been assigned an income classification						

Assessment Area(s) - Washington-Baltimore-Arlington, DC-MD-VA-WV-PA Combined Statistical Area						
2024						
Demographic Characteristics	#	Low % of #	Moderate % of #	Middle % of #	Upper % of #	NA* % of #
Geographies (Census Tracts)	1,014	8.28	21.10	32.64	35.90	2.07
Population by Geography	4,264,824	7.89	21.46	33.77	36.04	0.84
Housing Units by Geography	1,605,225	8.26	21.74	33.25	36.04	0.71
Owner-Occupied Housing by Geography	915,425	3.89	16.70	35.87	43.28	0.26
Occupied Rental Units by Geography	596,787	14.42	29.09	29.86	25.36	1.27
Vacant Units by Geography	93,013	11.74	24.10	29.29	33.39	1.49
Businesses by Geography	244,713	4.83	17.14	35.76	41.14	1.13
Farms by Geography	4,307	3.78	17.23	36.96	41.82	0.21
Family Distribution by Income Level	944,637	21.01	16.44	20.11	42.44	0.00
Household Distribution by Income Level	1,512,212	22.31	16.14	18.92	42.64	0.00
Unemployment rate (%)	4.99	9.60	6.04	4.77	3.63	5.04
Households Below Poverty Level (%)	7.61	21.03	10.22	5.81	4.58	15.31
Median Family Income (11694 - Arlington-Alexandria-Reston, VA-WV MD)		\$135,790	Median Housing Value			\$454,000
Median Family Income (47764 - Washington, DC-MD MD)		\$106,818	Median Gross Rent			\$1,816
Median Family Income (11694 - Arlington-Alexandria-Reston, VA-WV MD) for 2024		\$164,200	Families Below Poverty Level			5.32
Median Family Income (47764 - Washington, DC-MD MD) for 2024		\$128,300				
FFIEC File - 2024 Census						
2024 Dun & Bradstreet SBSF Demographics						
Due to rounding, totals may not equal 100.0%						
(*) The NA category consists of geographies that have not been assigned an income classification						

Employment and Economic Factors

According to the Bureau of Labor Statistics, the average unemployment rates in the Washington CSA AA were 2.2, 2.4 and 2.7 percent for 2022, 2023, and 2024, respectively. These unemployment rates were somewhat below those of the state of Virginia, who reported averages of 2.7, 2.7, and 2.9 percent for 2022, 2023, and 2024, respectively. The national unemployment averages were somewhat higher than those of the AA, at 3.6, 3.6, and 4.0 percent, for 2022, 2023, and 2024, respectively.

The OCC obtained economic data for the Washington CSA AA from the Moody's Analytics Report as of February 2025. This report indicated that the economic drivers for the area are non-defense sectors of the federal government, defense spending, and high-tech industries. The report identified several strengths and weaknesses of the Washington MSA. Strengths included high per capita income, an educated workforce, status as a major center for computer systems design and tech-related professional services, and popularity as a tourist destination. However, challenges such as exposure to downturns in tourism, above-average living costs, high reliance on federal government employment, and significant business and regulatory costs were noted.

The report further stated that federal layoffs will cause the most severe payroll decline in the nation. The high-wage segment of the private sector will absorb some workers, but the resulting reduction in income and spending will harm consumer industries. Absorption of ex-federal workers into the private sector will be limited by its capacity. Moreover, government budget constraints will weigh on contracting and thus limit hiring. The top employers for the area are the federal government, Inova Health System, MedStar Health, Marriott International, Inc., Booz Allen Hamilton, and The University of Maryland.

Housing

The Washington CSA AA provides sufficient opportunity to lend to LMI geographies within the AA. The 2022–2023 evaluation period reported 99 low-income geographies, and 259 moderate-income geographies located within the 1,231 CTs. The majority of the CTs, 67.1 percent, are in middle- and upper-income geographies. Housing units within the LMI geographies remain low compared to middle- and upper-income geographies. There are 1,995,700 total housing units in the AA, of which 58.1 percent are owner-occupied, 36.3 percent are rental-occupied, and 5.55 percent are vacant housing units. As a percentage of total housing units in the AA, low- or moderate- income geographies represent 9.1 percent and 22.1 percent, respectively.

Home ownership in LMI geographies may be difficult due to high median housing prices compared to median family income. According to the 2020 U.S. Census, the median housing value was \$455,400 which is relatively high for LMI households in the AA. The 2020 U.S. Census reported the Washington-Arlington-Alexandria, DC-VA-WV-MD MSA Median Family Income was \$126,224, which would result in a low-income household annual income below \$63,112, and a moderate-income household annual income between \$63,112 and \$100,979. These income levels could make it difficult to afford housing at the median housing value in this AA for LMI borrowers.

Community Contacts

As part of the evaluation, the OCC reviewed two community contacts completed by the Federal Deposit Insurance Association (FDIC) for institutions located in the Washington CSA AA. The first contact was a nonprofit real estate developer that owns and preserves residential housing throughout Northern Virginia, Washington, D.C. and Maryland areas. This organization provides safe and affordable housing to more than 5,000 people in the DC area through multi-family housing communities. The target audience for this organization is to lend to tenants earning between 30-80 percent of area median income. The contact stated there is a significant need for affordable housing in the AA. The contact said that most low- and moderate-income individuals cannot obtain safe and affordable housing in the Washington D.C. Area. The organization had positive interactions with local area banks and stated that local banks were interested in partnering in affordable housing projects.

The second contact was a non-profit housing organization providing housing programs and supportive services to those in need throughout the Washington CSA AA. The organization offers home counseling to residents of the county, particularly to first-time home buyers; and purchases homes, rehabilitates them, and then sells them to first-time home buyers. The contact stated that the community faces affordable housing challenges as the area has low- and moderate-income individuals and families. Some issues in the area that low- and moderate-income individuals or families are dealing with, especially during and after the COVID-19 pandemic, are high housing costs, not enough income for basics such as food, transportation challenges, and substandard rental conditions in some of the units that are affordable. Opportunities for participation by local financial institutions included providing financial assistance to individuals and families to tackle affordable housing credit needs.

Scope of Evaluation in Virginia

The OCC performed a full-scope review of the Washington CSA AA for the evaluation period because a majority of bank deposits and branches are located in that AA. A limited scope review was performed for the Charlottesville VA MSA AA for the same evaluation period. Bank dedicated AAs located in the same

MSA, or as applicable CSA, are combined, analyzed, and presented as one AA for purposes of this evaluation. Refer to Appendix A for a list of all AAs under review.

Home mortgage loans and small business loans were given equal weighting for the lending test for the Washington CSA AA. According to internal lending data, the bank originated 195 home mortgage loans, representing 63.1 percent of total loans originated in the AA; and the bank originated 121 small business loans, representing 39.2 percent of total loans originated in the AA. Small farm and multi-family loans were not evaluated because the bank did not originate or purchase a sufficient volume of small farm or multi-family loans in the AA.

CONCLUSIONS WITH RESPECT TO PERFORMANCE TESTS IN VIRGINIA

LENDING TEST

The bank's performance under the Lending Test in Virginia is rated Satisfactory.

Conclusions for Area Receiving a Full-Scope Review

Based on a full-scope review, the bank's lending performance in the state of Virginia was reasonable.

Distribution of Loans by Income Level of the Geography

The bank exhibited reasonable geographic distribution of loans in the state. The analysis placed more emphasis on the bank's performance in moderate-income geographies as these areas had a higher percentage of owner-occupied housing units and small businesses.

Home Mortgage Loans

Refer to Table 7 in the state of Virginia section of Appendix D for the facts and data used to evaluate the geographic distribution of the bank's home mortgage loan originations and purchases.

Based on the data in the tables and considering performance context factors discussed above, the overall geographic distribution of home mortgage loans in the Washington CSA AA was reasonable.

2022-2023

The percentage of home mortgage loans originated in low-income CTs exceeded the percentage of owner-occupied housing units in low-income CTs and the aggregate lending. The percentage of home mortgage loans originated in moderate-income CTs was well below the percentage of owner-occupied housing units in moderate-income CTs and the aggregate lending.

2024

The percentage of home mortgage loans originated in low-income CTs exceeded the percentage of owner-occupied housing units in low-income CTs and was near to the aggregate lending. The percentage of home mortgage loans originated in moderate-income CTs was well below the percentage of owner-occupied housing units in moderate-income CTs and the aggregate lending.

Small Loans to Businesses

Refer to Table 9 in the state of Virginia section of Appendix D for the facts and data used to evaluate the geographic distribution of the bank's originations and purchases of small loans to businesses.

Based on the data in the tables and considering performance context factors discussed above, the overall geographic distribution of small loans to businesses in the Washington CSA AA was reasonable.

2022-2023

The bank's percentage of small loans to businesses in low-income CTs was somewhat lower than the percentage of businesses located in low-income CTs and the aggregate lending. The bank's lending in moderate-income CTs is below the percentage of businesses located in moderate-income CTs and the aggregate lending.

2024

The bank's percentage of small loans to businesses in low-income CTs exceeded the percentage of businesses located in low-income CTs and the aggregate lending. The bank's lending in moderate-income CTs exceeded the percentage of businesses located in moderate-income CTs and was near to the aggregate lending.

Lending Gap Analysis

The OCC evaluated the lending distribution in the Washington CSA AA to determine if any unexplained, conspicuous gaps existed. The OCC reviewed summary reports, maps, and analyzed ODNB's lending activity over the evaluation period to identify any gaps in the geographic distribution of loans. The OCC did not identify any unexplained, conspicuous gaps.

Distribution of Loans by Income Level of the Borrower

The bank exhibited a reasonable distribution of loans to individuals of different income levels and businesses, given the product lines offered by the bank. The OCC analysis considered the following performance context factors when evaluating income distribution across the bank's full-scope AAs:

- The OCC acknowledged emerging home loan affordability issues within the bank's markets due to rising mortgage interest rates and rising housing costs. These considerations coupled with the intensity of competition from national and super-regional financial institutions within the AA were all considered when assessing the bank's distribution of home lending performance and its impact on the overall conclusions for distribution of lending by income level of the borrower.

Home Mortgage Loans

Refer to Table 8 in the state of Virginia section of Appendix D for the facts and data used to evaluate the borrower distribution of the bank's home mortgage loan originations and purchases.

Based on the data in the tables and considering performance context factors discussed above, the overall borrower distribution of home mortgage loans in the Washington CSA AA was reasonable.

2022-2023

The percentage of home mortgage loans to low-income borrowers is well below the percentage of families and is somewhat below the aggregate lending. The percentage of home mortgage loans to moderate-income borrowers is well below the percentage of families and the aggregate lending.

As previously stated in the Housing section for the Washington CSA AA, home ownership in LMI geographies may be difficult due to high median housing prices compared to median family income. According to the 2020 U.S. Census, the median housing value was \$455,400, and the median family income for low-income borrowers was less than \$63,112, making it difficult for low-income borrowers to afford housing in the AA.

2024

The bank did not originate any home mortgage loans to low-income borrowers during 2024. The percentage of home mortgage loans to moderate-income borrowers is well below the percentage of families and the aggregate lending.

As previously stated in the Housing section for the Washington CSA AA, home ownership in LMI geographies may be difficult due to high median housing prices compared to median family income. According to the U.S. Census, the median housing value for 2024, was \$454,000, and the median family income for low-income borrowers was less than \$64,150, making it difficult for low-income borrowers to afford housing in the AA.

Small Loans to Businesses

Refer to Table 10 in the state of Virginia section of Appendix D for the facts and data used to evaluate the borrower distribution of the bank's originations and purchases of small loans to businesses.

Based on the data in the tables and considering performance context factors discussed above, the overall geographic distribution of small loans to businesses in the Washington CSA AA was reasonable.

2022-2023

The percentage of bank loans to businesses with revenues of \$1 million or less was below the percentage of AA businesses reporting revenues of \$1 million or less and somewhat below the aggregate lending.

2024

The percentage of bank loans to businesses with revenues of \$1 million or less was below the percentage of AA businesses reporting revenues of \$1 million or less and the aggregate lending.

Responses to Complaints

The bank did not receive any CRA related complaints during the evaluation period.

Conclusions for Area Receiving a Limited Scope Review

Based on a limited-scope review, the bank's performance under the Lending Test in the Charlottesville, VA MSA AA was weaker than the bank's overall performance under the Lending Test in the full scope area. During the evaluation period, the bank originated eight home mortgage loans and three small loans to businesses. This population was too small to reflect a meaningful analysis.

COMMUNITY DEVELOPMENT TEST

The bank's performance under the Community Development Test in the state of Virginia is rated Outstanding.

Conclusions for Area Receiving a Full-Scope Review

Based on full-scope and limited-scope reviews, the bank exhibited excellent responsiveness to community development needs in the state through CD loans, qualified investments, and CD services, as appropriate, considering the bank's capacity and the need and availability of such opportunities for CD in the bank's AAs.

Number and Amount of Community Development Loans

The Community Development Loans Table, shown below, sets forth the information and data used to evaluate the bank's level of CD lending. The table includes all CD loans, including multifamily loans that also qualify as CD loans.

Table 3: Community Development Loans				
Assessment Area	Total			
	#	% of Total #	\$(000's)	% of Total \$
Washington CSA	23	100.0	43,234	100.0

The bank originated 23 CD loans totaling \$43.2 million, or 28.10 percent of tier 1 capital, that have a purpose, mandate, or function that directly benefits the Washington CSA AA. The bank continued to originate CD loans for affordable housing. The bank's affordable housing loans consisted primarily of loans to properties participating in the District of Columbia Housing Choice Voucher Program (DC-HCVP). The program provides rental assistance to low- and moderate-income renters.

The following are examples of CD loans the bank originated or purchased in this AA:

- A \$8.8 million loan funded the acquisition of an existing 20-unit apartment building and renovation of a 24-unit apartment building. Units will be leased to LMI residents through the DC-HCVP.
- A 3.4 million loan to refinance a 19-unit apartment building located in a low-income, majority-minority CT in the AA. Units will be leased to low-income residents through the DC-HCVP.
- A \$2 million loan to fund the acquisition and construction of a six-unit condominium located in a moderate-income, majority-minority CT. The units will be rented under the DC-HCVP.
- A \$1.4 million loan to refinance a three-unit condominium with two of the three units rented under the DC-VCHP.

- An SBA 504 loan for \$1.4 million to finance the acquisition and related improvements on commercial property in a middle-income CT in the AA.

Number and Amount of Qualified Investments

The Qualified Investment Table, shown below, sets forth the information and data used to evaluate the bank's level of qualified CD investments. This table included all CD investments, including prior period investments that remain outstanding as of the examination date.

Table 4: Qualified Investments										
Assessment Area	Prior Period*		Current Period		Total				Unfunded Commitments**	
	#	\$(000's)	#	\$(000's)	#	% of Total #	\$(000's)	% of Total \$	#	\$(000's)
Full Scope:										
Washington CSA	2	180	10	1,344	12	66.67	1,524	40.31	0	0
Limited Scope:										
Charlottesville VA MSA	0	0	2	11	2	11.11	11	0.29	0	0
Broader Statewide or Regional Area	3	1,184	1	1,062	4	22.22	2,246	59.40	0	0
Total	5	1,364	13	2,417	18	100.00	3,781	100.00	0	0

The bank made 18 qualifying investments and donations totaling \$3.8 million, representing 2.5 percent of tier 1 capital.

ODNB received credit for five CD investments made in a prior period and remained outstanding at the end of the current evaluation period. One prior period investment was a municipal bond used for stabilization efforts in low- or moderate-income geographies in the AA. The second prior period investment was a FHLB grant that promoted affordable housing by assisting low- to moderate-income customers with down payment, closing costs, and/or principal reduction on a home purchase in the AA. Three prior period investments were VHDA grants that promote affordable housing by financing single- and multi-family mortgage loans for low- and moderate-income individuals through the state of Virginia, including the Charlottesville VA MSA and Washington CSA AAs.

The following are examples of investments, grants, and donations in the AA during the evaluation period:

- FHLB grant for \$1.289 million that promoted affordable housing by assisting low- to moderate-income customers with down payment, closing costs, and/or principal reduction on a home purchase in the AA.
- ODNB extended donations to eight organizations in the AA, totaling \$20,775 during the evaluation period. These donations were used to support LMI individuals and families through homeless services, child abuse prevention, affordable housing, financial education, and other essential support services.

* 'Prior Period Investments' means investments made in a previous evaluation period that are outstanding as of the examination date.

** 'Unfunded Commitments' means legally binding investment commitments that are tracked and recorded by the institution's financial reporting system.

Broader, Statewide, or Regional Area

The bank purchased one CD investment, during the evaluation period, totaling \$1.1 million in the broader, statewide, or regional area that promoted affordable housing by financing single-, and multi-family mortgage loans for LMI individuals throughout the state of Virginia, including the Charlottesville VA MSA AA and the Washington CSA AA.

Extent to Which the Bank Provides Community Development Services

Bank personnel volunteered by providing financial/technical expertise for organizations that focus on economic development, promoting community service, and financial literacy to low- and moderate-income individuals and families. Seventeen bank personnel provided 545 hours of qualified CD services during the evaluation period.

- One ODNB employee provided 70 hours of financial management to an organization that provides community services for food and shelter, access to healthcare, and services to children for low-income families in the AA.
- One ODNB employee provided 120 hours as a board member, providing information technology expertise to a nonprofit educational and advocacy organization to refurbish donated laptops and installing/maintaining Wi-Fi at the organization's headquarters.
- Twenty-one ODNB employees provided 128 hours of financial/technical expertise to nonprofit organizations that offer personal financial planning, budgeting simulation, and career exploration programs to students in low- and moderate-income geographies in the AA.

Conclusions for Area Receiving a Limited Scope Review

Based on a limited-scope review, the bank's performance under the CD Test in the Charlottesville, VA MSA AA was weaker than the bank's overall performance under the CD Test in the full scope area. The bank did not originate CD loans that benefitted the AA. The bank made two investments to community organizations that benefitted the AA. There was one bank employee who provided CD services to an organization that provided legal services to low- and moderate-income families in the AA.

State Rating

State of Pennsylvania

CRA rating for the State of Pennsylvania: Satisfactory

The Lending Test is rated: Satisfactory

The Community Development Test is rated: Satisfactory

The major factors that support this rating include:

- The bank exhibits reasonable geographic distribution of loans in the bank's AA.
- The bank exhibits reasonable distribution of loans to individuals of different income levels and businesses of different sizes in the bank's AA, given the product lines offered by the bank.
- CD lending, investments, and services reflects adequate responsiveness to the needs of the bank's AA.

Description of Institution's Operations in Pennsylvania

ODNB identified the State College, PA MSA as its AA which included Centre County, PA in its entirety. The State College, PA MSA AA includes 41 CTs, consisting of one low-income CT, eight moderate-income CTs, 19 middle-income CTs, nine upper-income CTs, and four CTs without an assigned income classification. The AA consists of entire cities and counties and does not arbitrarily exclude low or moderate-income tracts.

The bank operates one full-service branch in an upper-income CT in this AA. The branch includes a drive-thru facility and an ATM. Hours of operations for the branch are Monday through Friday, 9:00 a.m. to 5:00 p.m.

According to the FDIC Summary of Deposits as of June 30, 2024, ODNB ranked eighth of 16 institutions operating in the AA with a deposit market share of 4.1 percent. PNC Bank, N.A., First National Bank of Pennsylvania, and Kish Bank, maintain the largest deposit market shares in the AA of 24.0 percent, 18.1 percent, and 11.5 percent, respectively.

Based on the 2023 Peer Mortgage Data, ODNB ranked 15th of the top 100 institutions competing for home mortgage loans in the AA with a market share of 2.2 percent. The top five lenders, with a combined market share of 35.5 percent by count of home mortgage loans, are Citizens Bank, N.A., Kish Bank, Jersey Shore State Bank, United Wholesale Mortgage, and First National Bank of Pennsylvania.

State College PA MSA AA

The following tables provide a summary of the demographics, including housing, business, and economic information for the State College PA MSA AA.

Assessment Area - State College PA MSA						
2022 - 2024						
Demographic Characteristics	#	Low % of #	Moderate % of #	Middle % of #	Upper % of #	NA* % of #
Geographies (Census Tracts)	41	2.44	19.51	46.34	21.95	9.76
Population by Geography	158,172	3.64	14.75	49.23	20.76	11.62
Housing Units by Geography	67,062	0.23	17.53	56.21	21.67	4.36
Owner-Occupied Housing by Geography	37,083	0.00	16.75	59.90	23.21	0.14
Occupied Rental Units by Geography	22,297	0.50	17.35	51.41	19.94	10.80
Vacant Units by Geography	7,682	0.56	21.83	52.37	19.21	6.03
Businesses by Geography	5,908	1.02	16.91	49.17	26.05	6.86
Farms by Geography	313	0.32	18.85	64.54	15.97	0.32
Family Distribution by Income Level	33,317	18.21	19.03	23.24	39.53	0.00
Household Distribution by Income Level	59,380	25.93	15.01	16.97	42.09	0.00
Unemployment rate (%)	4.06	11.09	3.36	3.66	3.08	11.98
Households Below Poverty Level (%)	15.57	33.04	15.58	12.34	13.11	71.95
Median Family Income (44300 - State College, PA MSA)		\$90,415	Median Housing Value			\$238,900
Median Family Income (44300 - State College, PA MSA) for 2024		\$108,200	Median Gross Rent			\$930
			Families Below Poverty Level			4.60
FFIEC File - 2020 Census						
FFIEC File - 2024 Census						
2024 Dun & Bradstreet SBSF Demographics						
Due to rounding, totals may not equal 100.0%						
(*) The NA category consists of geographies that have not been assigned an income classification						

Employment and Economic Factors

According to the U. S. Bureau of Labor Statistics, the unemployment rates in the State College, PA MSA AA averaged 3.4, 2.9, and 2.9 percent for 2022, 2023, and 2024, respectively. These unemployment rates were somewhat below those of the state of Pennsylvania, who reported averages of 4.1, 3.7, and 3.6 percent for 2022, 2023, and 2024, respectively. The national unemployment averages were comparable to those of the state of Pennsylvania, at 3.6, 3.6, and 4.0 percent, for 2022, 2023, and 2024, respectively.

Moody's Analytics Report as of January 2025, indicated that the economic drivers for the area are Pennsylvania State University (PSU), and high-tech industries. The State College economy is moving in the right direction. After stumbling in mid-2024, nonfarm payrolls rebounded in the second half of the year, rising to a multiyear high by year's end. State government jobs directly associated with PSU account for nearly one-third of the employment in the AA. PSU's status as a leading research institution account for high-tech payrolls. Medical services will be a major driver of short-term growth due to the growing population of those 65 or older, who require additional healthcare facilities. The top employers for the area are PSU, Mount Nittany Medical Center, Glenn O. Hawbaker, Inc., Raytheon Company, and AccuWeather, Inc.

Housing

The State College, PA MSA provides limited opportunity to lend to LMI geographies within the AA. There is one low-income geography, and eight moderate-income geographies located within the 41 CTs. The majority of the CTs, 68.29 percent, are in middle- and upper-income geographies. Housing units within the LMI geographies remain low compared to middle- and upper-income geographies. There are 67,062 total housing units in the AA, of which 55.3 percent are owner-occupied, 33.2 percent are rental-occupied, and 11.5 percent are vacant housing units. As a percentage of total housing units in the AA, low- and moderate-income geographies represent less than one percent and 17.5 percent, respectively.

Home ownership in LMI geographies may be difficult due to high median housing prices compared to median family income. According to the 2020 U.S. Census, the median housing value was \$238,900 and is relatively high for LMI households in the AA. The 2020 U.S. Census reported the MSA Median Family Income was \$90,415, which would result in a low-income household annual income of below \$45,207, and a moderate-income household annual income between \$45,207 and \$72,332. These income levels could make it difficult to afford housing at the median housing value in this AA for LMI borrowers. Households below poverty rates make up 33.0 percent of households in low-income geographies and 15.6 percent of households in moderate-income geographies.

Community Contact

As part of the evaluation, the OCC conducted one community contact for an institution located in Centre County, PA. The first contact is a non-profit organization assisting people with disabilities and their families in Centre County. Programs include early intervention, support for people with intellectual disabilities, autism, and mental health; and paid, integration employment. The organization representative stated that there are opportunities for CD participation through local municipalities and the county government, for economic planning and financing programs. The representative stated that significant financial involvement was evident with sponsorships of nonprofits in the area and bank employee participation on local nonprofit boards.

The OCC also reviewed a community contact conducted by the FDIC for an institution located in Centre County, PA. The organization is an independent, non-profit organization that provides affordable housing in Centre County. The organization buys existing houses in the area, renovates them, and sells them to an income qualifying household. Total of around 85 units have been rented or sold to LMI individuals. Funding through HUD is available. The contact stated that there is a need for low-income housing in the AA. The contact stated that local financial institutions are heavily involved in CD activities.

Scope of Evaluation in Pennsylvania

The OCC performed a full-scope review of the State College, PA MSA AA for the evaluation period. There was no limited scope reviews performed for the state of Pennsylvania. Refer to Appendix A for a list of all AAs under review.

The bank originated 188 loans in the AA, totaling \$132.9 million, which represented 21.4 percent of all loans originated during the evaluation period, based upon internal bank data.

Home mortgage loans and small business loans were given equal weighting for the lending test for the State College, PA MSA AA. According to internal lending data, the bank originated 130 home mortgage loans, representing 69.1 percent of total loans originated in the AA; and the bank originated 38 small business loans, representing 20.2 percent of total loans originated in the AA. Small farm and multi-family loans were not evaluated because the bank did not originate or purchase a sufficient volume of small farm or multi-family loans in the AA.

CONCLUSIONS WITH RESPECT TO PERFORMANCE TESTS IN PENNSYLVANIA

LENDING TEST

The bank's performance under the Lending Test in Pennsylvania is rated Satisfactory.

Conclusions for Area Receiving a Full-Scope Review

Based on a full-scope review, the bank's lending performance in the state of Pennsylvania was reasonable.

Distribution of Loans by Income Level of the Geography

The bank exhibited reasonable geographic distribution of loans in the state.

Home Mortgage Loans

Refer to Table 7 in the state of Pennsylvania section of Appendix D for the facts and data used to evaluate the geographic distribution of the bank's home mortgage loan originations and purchases.

The geographic distribution of home mortgage loans is reasonable. The percentage of home mortgage loans to borrowers in moderate-income CTs is somewhat below the percentage of owner-occupied housing units and the percentage of aggregate lending. The AA did not include any low-income CTs.

Small Loans to Businesses

Refer to Table 9 in the state of Pennsylvania section of Appendix D for the facts and data used to evaluate the geographic distribution of the bank's originations of small loans to businesses.

The geographic distribution of small loans to businesses is excellent. The bank's small loans to businesses in moderate-income geographies exceeded the percentage of businesses located in moderate-income geographies and the aggregate lending. The bank did not originate any loans in low-income geographies.

Lending Gap Analysis

The OCC evaluated the lending distribution in the State College, PA MSA AA to determine if any unexplained, conspicuous gaps existed. The OCC reviewed summary reports, maps, and analyzed ODNB's lending activity over the evaluation period to identify any gaps in the geographic distribution of loans. The OCC did not identify any unexplained, conspicuous gaps.

Distribution of Loans by Income Level of the Borrower

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

Home Mortgage Loans

Refer to Table 8 in the state of Pennsylvania section of Appendix D for the facts and data used to evaluate the borrower distribution of the bank's home mortgage loan originations and purchases.

The borrower distribution of home mortgage loans is reasonable.

The percentage of home mortgage loans to low-income borrowers is well-below the percentage of low-income families and the aggregate lending in the AA. The percentage of home mortgage loans to moderate-income borrowers is below the percentage of moderate-income families and the aggregate lending.

The borrower distribution of home mortgage loans is reasonable, considering the homeownership difficulties in LMI geographies due to high median housing prices compared to median family income, and a high percentage of renter occupied units in LMI geographies.

Small Loans to Businesses

Refer to Table 10 in the state of Pennsylvania section of Appendix D for the facts and data used to evaluate the borrower distribution of the bank's originations and purchases of small loans to businesses.

The borrower distribution of small loans to businesses is reasonable.

The percentage of bank loans to businesses with revenues of \$1 million or less was below the percentage of AA businesses reporting revenues of \$1 million or less and exceeded the aggregate lending.

Responses to Complaints

The bank did not receive any CRA related complaints during the evaluation period.

COMMUNITY DEVELOPMENT TEST

The bank's performance under the Community Development Test in the state of Pennsylvania is rated Satisfactory.

Conclusions for Area Receiving a Full-Scope Review

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

Number and Amount of Community Development Loans

The Community Development Loans Table, shown below, sets forth the information and data used to evaluate the bank's level of CD lending. The table includes all CD loans, including multifamily loans that also qualify as CD loans.

Table 3: Community Development Loans				
Assessment Area	Total			
	#	% of Total #	\$(000's)	% of Total \$
State College PA MSA	1	100.00	617	100.0

The bank originated one loan in this AA to provide a letter of credit to support job creation in three adjacent low- and moderate-income areas, which will stabilize and revitalize the AA.

Number and Amount of Qualified Investments

Table 4: Qualified Investments									
Assessment Area	Prior Period*		Current Period		Total				Unfunded Commitments**
	#	\$(000's)	#	\$(000's)	#	% of Total #	\$(000's)	% of Total \$	#
State College PA MSA	0	0	3	54	3	100.00	54	100.00	0

The bank made one investment and two donations totaling \$54,460, representing less than one percent of tier 1 capital.

The following are examples of investments and donations in the AA:

- The bank provided an investment of \$38,605 to a for profit organization that provides legal services to the poor and disadvantaged.
- The bank provided donations of \$15,000 to a nonprofit organization that provides services to low- and moderate-income individuals with disabilities.

Extent to Which the Bank Provides Community Development Services

The bank had three bank employees who provided 711 hours of CD services through four programs during the evaluation period. The CD services provided by the bank are:

- One employee provided 600 hours of financial and technical expertise to a non-profit organization that provides child advocacy services to low- and moderate-income families in the AA.
- One employee provided 108 hours of lending expertise for an economic development authority that assists local businesses in securing financing for construction projects in the AA.

* 'Prior Period Investments' means investments made in a previous evaluation period that are outstanding as of the examination date.

Appendix A: Scope of Examination

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

Time Period Reviewed:	01/01/2022 through 12/31/2024	
Bank Products Reviewed:	Home mortgage loans, small business loans Community development loans, qualified investments, community development services	
Affiliate(s)	Affiliate Relationship	Products Reviewed
NONE	Not applicable	Not applicable
List of Assessment Areas and Type of Examination		
Rating and Assessment Areas	Type of Exam	Other Information
Pennsylvania		
State College PA MSA	Full Scope	All 41 CTs in Centre County in the state of Pennsylvania
Virginia		
Washington-Baltimore-Arlington, DC-MD-VA-WV-PA CSA	Full scope	For 2022 and 2023 - All 1,231 CTs in the District of Columbia, Maryland counties of Prince George's and Montgomery, Virginia counties of Arlington, Fairfax, Loudoun, and Prince William, and Virginia cities of Alexandria, Falls Church, Fairfax, Manassas, and Manassas Park. For 2024 – All 1,014 CTs in District of Columbia, Maryland counties of Prince George's, Virginia counties of Arlington, Fairfax, Loudoun, and Prince William, and Virginia cities of Alexandria, Falls Church, Fairfax, Manassas, and Manassas Park, and West Virginia counties of Jefferson.
Charlottesville VA MSA	Limited scope	All 44 CTs in the city of Charlottesville, and the counties of Albemarle, Fluvanna, Green, and Nelson in the state of Virginia.

Appendix B: Summary of State Ratings

RATINGS			
Overall Bank:	Lending Test Rating*	CD Test Rating	Overall Bank/State/Multistate Rating
Old Dominion National Bank	Satisfactory	Satisfactory	Satisfactory
State:			
Virginia	Satisfactory	Outstanding	Satisfactory
Pennsylvania	Satisfactory	Satisfactory	Satisfactory

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

Appendix C: Definitions and Common Abbreviations

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

Multifamily: Refers to a residential structure that contains five or more units.

Multistate Metropolitan Statistical Area (MMSA): Any multistate metropolitan statistical area or multistate combined statistical area, as defined by the Office of Management and Budget.

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.

Prior Period Investments: Investments made in a previous evaluation period that are outstanding as of the end of the evaluation period.

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

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

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

Small Loan(s) to Farm(s): A loan included in 'loans to small farms' as defined in the instructions for preparation of the Consolidated Report of Condition and Income (Call Report). These loans have original

amounts of \$500,000 or less and are either secured by farmland or are classified as loans to finance agricultural production and other loans to farmers.

Tier 1 Capital: The total of common shareholders' equity, perpetual preferred shareholders' equity with non-cumulative dividends, retained earnings and minority interests in the equity accounts of consolidated subsidiaries.

Unfunded Commitments: Legally binding investment commitments that are tracked and recorded by the institution's financial reporting system.

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

Appendix D: Tables of Performance Data

Content of Standardized Tables

A separate set of tables is provided for each state. All multistate metropolitan statistical areas, if applicable, are presented in one set of tables. References to the “bank” include activities of any affiliates that the bank provided for consideration (refer to Appendix A: Scope of the Examination). For purposes of reviewing the Lending Test tables, the following are applicable: (1) purchased are treated as originations; and (2) “aggregate” is the percentage of the aggregate number of reportable loans originated and purchased by all HMDA or CRA-reporting lenders in the MMSA/AA. Deposit data are compiled by the FDIC and are available as of June 30th of each year. Tables without data are not included in this PE.

The following is a listing and brief description of the tables included in each set:

- Table 7. Assessment Area Distribution of Home Mortgage Loans by Income Category of the Geography** - Compares the percentage distribution of the number of loans originated and purchased by the bank in low-, moderate-, middle-, and upper-income geographies to the percentage distribution of owner-occupied housing units throughout those geographies. The table also presents aggregate peer data for the years the data is available.
- Table 8. Assessment Area Distribution of Home Mortgage Loans by Income Category of the Borrower** - Compares the percentage distribution of the number of loans originated and purchased by the bank to low-, moderate-, middle-, and upper-income borrowers to the percentage distribution of families by income level in each MMSA/AA. The table also presents aggregate peer data for the years the data is available.
- Table 9. Assessment Area Distribution of Loans to Small Businesses by Income Category of the Geography** - The percentage distribution of the number of small loans (less than or equal to \$1 million) to businesses that were originated and purchased by the bank in low-, moderate-, middle-, and upper-income geographies compared to the percentage distribution of businesses (regardless of revenue size) in those geographies. Because aggregate small business data are not available for geographic areas smaller than counties, it may be necessary to compare bank loan data to aggregate data from geographic areas larger than the bank’s AA.
- Table 10. Assessment Area Distribution of Loans to Small Businesses by Gross Annual Revenue** - Compares the percentage distribution of the number of small loans (loans less than or equal to \$1 million) originated and purchased by the bank to businesses with revenues of \$1 million or less to: 1) the percentage distribution of businesses with revenues of greater than \$1 million; and 2) the percentage distribution of businesses for which revenues are not available. The table also presents aggregate peer small business data for the years the data is available.

Table 7: Assessment Area Distribution of Home Mortgage Loans by Income Category of the Geography																			2022 - 2023	
Assessment Area:	Total Home Mortgage Loans				Low-Income Tracts			Moderate-Income Tracts			Middle-Income Tracts			Upper-Income Tracts			Not Available-Income Tracts			
	#	\$	% of Total Number	Overall Market	% of Owner-Occupied Housing Units	% Bank Loans	% Aggregate	% of Owner-Occupied Housing Units	% Bank Loans	% Aggregate	% of Owner-Occupied Housing Units	% Bank Loans	% Aggregate	% of Owner-Occupied Housing Units	% Bank Loans	% Aggregate	% of Owner-Occupied Housing Units	% Bank Loans	% Aggregate	
Washington CSA	141	184,129	100.00	225,150	4.07	5.67	4.49	17.92	4.26	18.14	33.80	17.02	34.54	44.01	73.05	42.60	0.21	--	0.24	
Total	141	184,129	100.00	255,150	4.07	5.67	4.49	17.92	4.26	18.14	33.80	17.02	34.54	44.01	73.05	42.60	0.21	--	0.24	
Source: FFIEC File - 2020 Census; 1/1/2022 - 12/31/2023 Bank Data, 2022 HMDA Aggregate Data, "--" data not available.																				
Due to rounding, totals may not equal 100.0%																				

Table 7: Assessment Area Distribution of Home Mortgage Loans by Income Category of the Geography																			2024
Assessment Area:	Total Home Mortgage Loans				Low-Income Tracts			Moderate-Income Tracts			Middle-Income Tracts			Upper-Income Tracts			Not Available-Income Tracts		
	#	\$	% of Total Number	Overall Market	% of Owner-Occupied Housing Units	% Bank Loans	% Aggregate	% of Owner-Occupied Housing Units	% Bank Loans	% Aggregate	% of Owner-Occupied Housing Units	% Bank Loans	% Aggregate	% of Owner-Occupied Housing Units	% Bank Loans	% Aggregate	% of Owner-Occupied Housing Units	% Bank Loans	% Aggregate
Washington CSA	61	99,794	100.00	79,989	3.89	4.92	5.05	16.70	4.92	18.12	35.87	11.48	34.35	43.28	78.69	42.09	0.26	--	0.39
Total	61	99,794	100.00	79,989	3.89	4.92	5.05	16.70	4.92	18.12	35.87	11.48	34.35	43.28	78.69	42.09	0.26	--	0.39
Source: FFIEC File - 2024 Census; 1/1/2024 - 12/31/2024 Bank Data, -- HMDA Aggregate Data, "--" data not available.																			
Due to rounding, totals may not equal 100.0%																			

Table 7: Assessment Area Distribution of Home Mortgage Loans by Income Category of the Geography																				2022 - 2024
Assessment Area:	Total Home Mortgage Loans				Low-Income Tracts			Moderate-Income Tracts			Middle-Income Tracts			Upper-Income Tracts			Not Available-Income Tracts			
	#	\$	% of Total Number	Overall Market	% of Owner-Occupied Housing Units	% Bank Loans	% Aggregate	% of Owner-Occupied Housing Units	% Bank Loans	% Aggregate	% of Owner-Occupied Housing Units	% Bank Loans	% Aggregate	% of Owner-Occupied Housing Units	% Bank Loans	% Aggregate	% of Owner-Occupied Housing Units	% Bank Loans	% Aggregate	
Charlottesville VA MSA	8	7,752	100.00	12,310	0.53	12.50	0.73	20.41	--	17.51	47.89	87.50	49.06	31.17	--	32.70	--	--	--	
Total	8	7,752	100.00	12,310	0.53	12.50	0.73	20.41	--	17.51	47.89	87.50	49.06	31.17	--	32.70	--	--	--	
Source: FFIEC File - 2020, 2024 Census; 1/1/2022 - 12/31/2024 Bank Data, 2022 HMDA Aggregate Data, "--" data not available.																				
Due to rounding, totals may not equal 100.0%																				

Appendix D-2

Table 7: Assessment Area Distribution of Home Mortgage Loans by Income Category of the Geography																			2022 - 2024
Assessment Area:	Total Home Mortgage Loans				Low-Income Tracts			Moderate-Income Tracts			Middle-Income Tracts			Upper-Income Tracts			Not Available-Income Tracts		
	#	\$	% of Total Number	Overall Market	% of Owner-Occupied Housing Units	% Bank Loans	% Aggregate	% of Owner-Occupied Housing Units	% Bank Loans	% Aggregate	% of Owner-Occupied Housing Units	% Bank Loans	% Aggregate	% of Owner-Occupied Housing Units	% Bank Loans	% Aggregate	% of Owner-Occupied Housing Units	% Bank Loans	% Aggregate
State College PA MSA	130	52,271	100.00	6,046	--	--	--	16.75	10.77	16.59	59.90	47.69	57.69	23.21	41.54	25.29	0.14	--	0.43
Total	130	52,271	100.00	6,046	--	--	--	16.75	10.77	16.59	59.90	47.69	57.69	23.21	41.54	25.29	0.14	--	0.43

Source: FFIEC File - 2020, 2024 Census; 1/1/2022 - 12/31/2024 Bank Data, 2022 HMDA Aggregate Data, "--" data not available.
Due to rounding, totals may not equal 100.0%

Table 8: Assessment Area Distribution of Home Mortgage Loans by Income Category of the Borrower																			2022 - 2023
Assessment Area:	Total Home Mortgage Loans				Low-Income Borrowers			Moderate-Income Borrowers			Middle-Income Borrowers			Upper-Income Borrowers			Not Available-Income Borrowers		
	#	\$	% of Total Number	Overall Market	% Families	% Bank Loans	% Aggregate	% Families	% Bank Loans	% Aggregate	% Families	% Bank Loans	% Aggregate	% Families	% Bank Loans	% Aggregate	% Families	% Bank Loans	% Aggregate
Washington CSA	141	184,129	100.00	225,150	21.47	1.42	8.36	16.42	5.67	19.97	19.78	7.80	22.22	42.33	44.68	34.05	--	40.43	15.39
Total	141	184,129	100.00	255,150	21.47	1.42	8.36	16.42	5.67	19.97	19.78	7.80	22.22	42.33	44.68	34.05	--	40.43	15.39

Source: FFIEC File - 2020 Census; 1/1/2022 - 12/31/2023 Bank Data, 2022 HMDA Aggregate Data, "--" data not available.
Due to rounding, totals may not equal 100.0%

Table 8: Assessment Area Distribution of Home Mortgage Loans by Income Category of the Borrower																			2024
Assessment Area:	Total Home Mortgage Loans				Low-Income Borrowers			Moderate-Income Borrowers			Middle-Income Borrowers			Upper-Income Borrowers			Not Available-Income Borrowers		
	#	\$	% of Total Number	Overall Market	% Families	% Bank Loans	% Aggregate	% Families	% Bank Loans	% Aggregate	% Families	% Bank Loans	% Aggregate	% Families	% Bank Loans	% Aggregate	% Families	% Bank Loans	% Aggregate
Washington CSA	61	99,794	100.00	79,989	21.01	--	7.67	16.44	1.64	20.35	20.11	3.28	22.98	42.44	50.82	32.51	--	44.26	16.49
Total	61	99,794	100.00	79,989	21.01	--	7.67	16.44	1.64	20.35	20.11	3.28	22.98	42.44	50.82	32.51	--	44.26	16.49

Source: FFIEC File - 2024 Census; 1/1/2024 - 12/31/2024 Bank Data, 2023 HMDA Aggregate Data, "--" data not available.
Due to rounding, totals may not equal 100.0%

Table 8: Assessment Area Distribution of Home Mortgage Loans by Income Category of the Borrower																			2022 - 2024
Assessment Area:	Total Home Mortgage Loans				Low-Income Borrowers			Moderate-Income Borrowers			Middle-Income Borrowers			Upper-Income Borrowers			Not Available-Income Borrowers		
	#	\$	% of Total Number	Overall Market	% Families	% Bank Loans	% Aggregate	% Families	% Bank Loans	% Aggregate	% Families	% Bank Loans	% Aggregate	% Families	% Bank Loans	% Aggregate	% Families	% Bank Loans	% Aggregate
Charlottesville VA MSA	87,752		100.00	12,310	19.59	12.50	9.89	17.80	--	17.63	21.81	37.50	20.83	40.79	12.50	35.08	--	37.50	16.58
Total	87,752		100.00	12,310	19.59	12.50	9.89	17.80	--	17.63	21.81	37.50	20.83	40.79	12.50	35.08	--	37.50	16.58

Source: FFIEC File - 2020, 2024 Census; 1/1/2022 - 12/31/2024 Bank Data, 2022 HMDA Aggregate Data, "--" data not available.
Due to rounding, totals may not equal 100.0%

Table 8: Assessment Area Distribution of Home Mortgage Loans by Income Category of the Borrower																			2022 - 2024
Assessment Area:	Total Home Mortgage Loans				Low-Income Borrowers			Moderate-Income Borrowers			Middle-Income Borrowers			Upper-Income Borrowers			Not Available-Income Borrowers		
	#	\$	% of Total Number	Overall Market	% Families	% Bank Loans	% Aggregate	% Families	% Bank Loans	% Aggregate	% Families	% Bank Loans	% Aggregate	% Families	% Bank Loans	% Aggregate	% Families	% Bank Loans	% Aggregate
State College PA MSA	130,52,271		100.00	6,046	18.21	3.08	11.15	19.03	10.77	20.38	23.24	16.15	23.55	39.53	59.23	35.78	--	10.77	9.15
Total	130,52,271		100.00	6,046	18.21	3.08	11.15	19.03	10.77	20.38	23.24	16.15	23.55	39.53	59.23	35.78	--	10.77	9.15

Source: FFIEC File - 2020, 2024 Census; 1/1/2022 - 12/31/2024 Bank Data, 2022 HMDA Aggregate Data, "--" data not available.
Due to rounding, totals may not equal 100.0%

Table 9: Assessment Area Distribution of Loans to Small Businesses by Income Category of the Geography																			2022 - 2023
Assessment Area:	Total Loans to Small Businesses				Low-Income Tracts			Moderate-Income Tracts			Middle-Income Tracts			Upper-Income Tracts			Not Available-Income Tracts		
	#	\$	% of Total Number	Overall Market	% Businesses	% Bank Loans	% Aggregate	% Businesses	% Bank Loans	% Aggregate	% Businesses	% Bank Loans	% Aggregate	% Businesses	% Bank Loans	% Aggregate	% Businesses	% Bank Loans	% Aggregate
Washington CSA	87,34,207		100.00	315,939	5.08	3.45	4.72	19.71	9.19	18.40	32.74	27.59	33.84	41.49	57.47	42.53	0.98	2.30	0.51
Total	87,34,207		100.00	315,939	5.08	3.45	4.72	19.71	9.19	18.40	32.74	27.59	33.84	41.49	57.47	42.53	0.98	2.30	0.51

Source: FFIEC File - 2020 Census; 1/1/2022 - 12/31/2023 Bank Data, 2022, 2023 Dunn & Bradstreet SBSF Demographics, 2022 CRA Aggregate Data, "--" data not available.
Due to rounding, totals may not equal 100.0%

Table 9: Assessment Area Distribution of Loans to Small Businesses by Income Category of the Geography																			2024
Assessment Area:	Total Loans to Small Businesses				Low-Income Tracts			Moderate-Income Tracts			Middle-Income Tracts			Upper-Income Tracts			Not Available-Income Tracts		
	#	\$	% of Total Number	Overall Market	% Businesses	% Bank Loans	% Aggregate	% Businesses	% Bank Loans	% Aggregate	% Businesses	% Bank Loans	% Aggregate	% Businesses	% Bank Loans	% Aggregate	% Businesses	% Bank Loans	% Aggregate
Washington CSA	34	19,135	100.00	124,284	4.83	5.88	4.61	17.14	17.65	17.87	35.76	35.29	33.30	41.14	41.18	43.56	1.13	0	0.65
Total	34	19,135	100.00	124,284	4.83	5.88	4.61	17.14	17.65	17.87	35.76	35.29	33.30	41.14	41.18	43.56	1.13	0	0.65

Source: FFIEC File - 2024 Census; 1/1/2024 - 12/31/2024 Bank Data, 2024 Dunn & Bradstreet SBSF Demographics, 2024 CRA Aggregate Data, "--" data not available.
Due to rounding, totals may not equal 100.0%

Table 9: Assessment Area Distribution of Loans to Small Businesses by Income Category of the Geography																			2022 - 2024
Assessment Area:	Total Loans to Small Businesses				Low-Income Tracts			Moderate-Income Tracts			Middle-Income Tracts			Upper-Income Tracts			Not Available-Income Tracts		
	#	\$	% of Total Number	Overall Market	% Businesses	% Bank Loans	% Aggregate	% Businesses	% Bank Loans	% Aggregate	% Businesses	% Bank Loans	% Aggregate	% Businesses	% Bank Loans	% Aggregate	% Businesses	% Bank Loans	% Aggregate
Charlottesville VA MSA	3	463	100.00	9,934	2.07	--	1.83	18.33	--	17.70	41.05	100.00	44.64	38.55	--	35.83	--	--	--
Total	3	463	100.00	9,934	2.07	--	1.83	18.33	--	17.70	41.05	100.00	44.64	38.55	--	35.83	--	--	--

Source: FFIEC File - 2020, 2024 Census; 1/1/2022 - 12/31/2024 Bank Data, 2022, 2023, 2024 Dunn & Bradstreet SBSF Demographics, 2022 CRA Aggregate Data, "--" data not available.
Due to rounding, totals may not equal 100.0%

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Assessment Area:	Total Loans to Small Businesses				Low-Income Tracts			Moderate-Income Tracts			Middle-Income Tracts			Upper-Income Tracts			Not Available-Income Tracts		
	#	\$	% of Total Number	Overall Market	% Businesses	% Bank Loans	% Aggregate	% Businesses	% Bank Loans	% Aggregate	% Businesses	% Bank Loans	% Aggregate	% Businesses	% Bank Loans	% Aggregate	% Businesses	% Bank Loans	% Aggregate
State College PA MSA	38	12,505	100.00	4,486	1.02	--	0.02	16.91	26.32	16.03	49.17	31.58	53.25	26.05	42.11	26.13	6.86	--	4.57
Total	38	12,505	100.00	4,486	1.02	--	0.02	16.91	26.32	16.03	49.17	31.58	53.25	26.05	42.11	26.13	6.86	--	4.57

Source: FFIEC File - 2020, 2024 Census; 1/1/2022 - 12/31/2024 Bank Data, 2022, 2023, 2024 Dunn & Bradstreet SBSF Demographics, 2022 CRA Aggregate Data, "--" data not available.
Due to rounding, totals may not equal 100.0%

Table 10: Assessment Area Distribution of Loans to Small Businesses by Gross Annual Revenues											2022 - 2023
Assessment Area:	Total Loans to Small Businesses				Businesses with Revenues <= 1MM			Businesses with Revenues > 1MM		Businesses with Revenues Not Available	
	#	\$	% of Total Number	Overall Market	% Businesses	% Bank Loans	% Aggregate	% Businesses	% Bank Loans	% Businesses	% Bank Loans
Washington CSA	87	34,207	100.00	315,939	83.54	40.23	53.54	8.77	57.47	7.69	2.30
Total	87	34,207	100.00	315,939	83.54	40.23	53.54	8.77	57.47	7.69	2.30

Source: FFIEC File - 2020 Census; 1/1/2022 - 12/31/2023 Bank Data, 2022, 2023 Dunn & Bradstreet SBSF Demographics, 2022 CRA Aggregate Data, "--" data not available.
Due to rounding, totals may not equal 100.0%

Table 10: Assessment Area Distribution of Loans to Small Businesses by Gross Annual Revenues											2024
Assessment Area:	Total Loans to Small Businesses				Businesses with Revenues <= 1MM			Businesses with Revenues > 1MM		Businesses with Revenues Not Available	
	#	\$	% of Total Number	Overall Market	% Businesses	% Bank Loans	% Aggregate	% Businesses	% Bank Loans	% Businesses	% Bank Loans
Washington CSA	34	19,135	100.00	124,284	84.54	23.53	55.07	7.86	76.47	7.59	0.00
Total	34	19,135	100.00	124,284	84.54	23.53	55.07	7.86	76.47	7.59	0.00

Source: FFIEC File - 2024 Census; 1/1/2024 - 12/31/2024 Bank Data, 2024 Dunn & Bradstreet SBSF Demographics, 2023 CRA Aggregate Data, "--" data not available.
Due to rounding, totals may not equal 100.0%

Table 10: Assessment Area Distribution of Loans to Small Businesses by Gross Annual Revenues											2022 - 2024
Assessment Area:	Total Loans to Small Businesses				Businesses with Revenues <= 1MM			Businesses with Revenues > 1MM		Businesses with Revenues Not Available	
	#	\$	% of Total Number	Overall Market	% Businesses	% Bank Loans	% Aggregate	% Businesses	% Bank Loans	% Businesses	% Bank Loans
Charlottesville VA MSA	3	463	100.00	9,934	82.87	--	58.16	8.75	100.00	8.39	--
Total	3	463	100.00	9,934	82.87	--	58.16	8.75	100.00	8.39	--

Source: FFIEC File - 2020, 2024 Census; 1/1/2022 - 12/31/2024 Bank Data, 2022, 2023, 2024 Dunn & Bradstreet SBSF Demographics, 2022 CRA Aggregate Data, "--" data not available.
Due to rounding, totals may not equal 100.0%

Table 10: Assessment Area Distribution of Loans to Small Businesses by Gross Annual Revenues											2022 - 2024
Assessment Area:	Total Loans to Small Businesses				Businesses with Revenues <= 1MM			Businesses with Revenues > 1MM		Businesses with Revenues Not Available	
	#	\$	% of Total Number	Overall Market	% Businesses	% Bank Loans	% Aggregate	% Businesses	% Bank Loans	% Businesses	% Bank Loans
State College PA MSA	38	12,505	0.00	4,486	77.91	60.53	52.81	9.70	31.58	12.39	7.89
Total	38	12,505	0.00	4,486	77.91	60.53	52.81	9.70	31.58	12.39	7.89

Source: FFIEC File - 2020, 2024 Census; 1/1/2022 - 12/31/2024 Bank Data, 2022, 2023, 2024 Dunn & Bradstreet SBSF Demographics, 2022 CRA Aggregate Data, "--" data not available.
Due to rounding, totals may not equal 100.0%



Public Written Comments

Listed below are written comments received from the public for the current year and each of the prior two calendar years that specifically relate to Old Dominion National Bank's performance in helping to meet community credit needs and responses to the comments by Old Dominion National Bank.

As of:

December 2024	No Comments Received
December 2025	No Comments Received
Thru September 2026	One (1) comment was received, as set forth below. Old Dominion National Bank was advised by the Office of the Comptroller of the Currency that a reply was not required."

August 7, 2026

By email to Licensing@occ.treas.gov

Office of the Comptroller of the Currency
Attn: Director for Licensing

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400 7th St., SW
Washington, DC 20219

Re: Comment Opposing Applications by National Capital Bank of Washington and Old Dominion to create a bank of \$2.4 billion in assets under weakened CRA

Dear Director and others at the OCC:

This is a timely comment opposing the Application by National Capital Bank of Washington and Old Dominion to create a bank of \$2.4 billion in assets under weakened CRA, which appears on the OCC's website with a comment period running through August 31. This comment is timely.

The applicant National Capital Bank of Washington in the District in 2025 made three loans to whites and only one to an African American applicant. It reported the identical data in Virginia in 2025.

These practices should not be allowed to expand.

The target Old Dominion in Virginia in 2025 reported that same 3-to-1 data, while in Virginia is made 22 loans to whites and NONE to African Americans. This is disparate; public hearings are needed and hereby requested.

We note that the OCC is proposing to significantly weakening CRA on banks below \$10 billion, like this proposed combination. Hearings are needed.

FFW and Inner City Press have been deeply concerned about the rush by the OCC's to rubber-stamp mergers by redliners, money launderers and predatory lenders. This has been killing the Community Reinvestment Act and we timely request public hearings. [Our timely comments on the evasion of CRA for fintechs by Column NA has still not been responded to].

We note now in August 2026 the OCC and FDIC propose to go further back on CRA than the previous reg, and de facto exempt many many banks based on size - we oppose that. Our FOIA request #2026-00448-F has yet to be substantively responded to.

The comment period should be extended; evidentiary hearings should be held; and on the current record, the application should not be approved.

Please immediately send all requested information -- including a complete copy of the application, during the comment period -- and responses by e-mail to lee@fairfinancewatch.org -- and if also by regular mail, to Matthew R. Lee, Esq. Fair Finance Watch c/o Matthew R. Lee Esq, PO Box 20047, NYC NY 10017 Please also confirm receipt of this formal submission. If you have any questions, please immediately telephone the undersigned, at (718) 716-3540.

Very Truly Yours,

Matthew Lee, Esq.

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Executive Director
Fair Finance Watch



BRANCH LISTING

CHARLOTTESVILLE BRANCH

852 W Main Street Suite 106

Charlottesville, Virginia 22903

Phone: (434) 293-1359

MSA/MD Code 16820, State Code 51, County Code 540, Tract Code 0002.02

HOURS OF OPERATION:

09:00 am to 05:00 pm Monday through Friday (Lobby)

SCOTTSVILLE BRANCH

110 Scottsville Centre

Scottsville, Virginia 24590

Phone: (434) 286-4284

MSA/MD Code 16820, State Code 51, County Code 003, Tract Code 0114.00

HOURS OF OPERATION:

09:00 am to 05:00 pm Monday through Friday (Lobby)

09:00 am to 05:00 pm Monday through Friday (Drive thru)

TYSONS CORNER BRANCH

8601 Westwood Center Drive

Vienna, Virginia 22182

Phone: (571) 299-6942

MSA/MD Code 11694, State Code 51, County Code 059, Tract Code 4604.00

HOURS OF OPERATION:

09:00 am to 05:00 pm Monday through Friday (Lobby)

09:00 am to 05:00 pm Monday through Friday (Drive thru)

LEESBURG BRANCH

106 Harrison Street SE, Suite 100

Leesburg, Virginia 20175

Phone: (571) 474-3501

MSA/MD Code 11694, State Code 51, County Code 107, Tract Code 6105.05

HOURS OF OPERATION:

09:00 am to 05:00 pm Monday through Friday (Lobby)

STATE COLLEGE BRANCH – CENTRE 1ST BANK, a Division of Old Dominion National Bank

1276 North Atherton Street

State College, Pennsylvania 16801

Phone: (814) 690-2226

MSA/MD Code 44300, State Code 42, County Code 027, Tract Code 0115.04

HOURS OF OPERATION:

09:00 am to 05:00 pm Monday through Thursday (Lobby)

09:00 am to 05:00 pm Monday through Friday (Drive thru)

BOCA RATON BRANCH

6699 N Federal Highway, Suite 104

Boca Raton, Florida 33487

Phone: (561) 765-2585

MSA/MD Code 48424, State Code 12, County Code 099, Tract Code 0073.01

HOURS OF OPERATION:

10:00 am to 03:00 pm Monday through Friday (Lobby)

DEPOSIT-TAKING ATM

1416 P St NW

Washington, District of Columbia 20005

MSA/MD Code 477644, State Code 44, County Code 001, Tract Code 0052.03

HOURS OF OPERATION:

24 Hours per Day, Seven Days a Week



Branch Openings

LEESBURG BRANCH

Opened March 2024.

106 Harrison Street SE, Suite 100

Leesburg, VA 20175

MSA/MD Code 11694, State Code 51, County Code 107, Tract Code 6105.05

HOURS OF OPERATION:

09:00 am to 05:00 pm Monday through Friday

BOCA RATON BRANCH

Opened November 2024.

6699 N Federal Highway, Suite 104

Boca Raton, FL 33487

MSA/MD Code 48424, State Code 12, County Code 099, Tract Code 0073.01

HOURS OF OPERATION:

10:00 am to 03:00 pm Monday through Friday

CHARLOTTESVILLE BRANCH

Opened December 2025.

852 W Main Street Suite 106

Charlottesville, Virginia 22903

MSA/MD Code 16820, State Code 51, County Code 540, Tract Code 0002.02

HOURS OF OPERATION:

09:00 am to 05:00 pm Monday through Friday (Lobby)

No branches were opened year-to-date in 2026.

Branch Closings

NORTH GARDEN BRANCH

Closed March 2026.

4916 Plank Road

North Garden, Virginia 22959

MSA/MD Code 16820, State Code 51, County Code 003, Tract Code 0112.02

HOURS OF OPERATION:

09:00 am to 05:00 pm Monday through Friday (Lobby)

09:00 am to 05:00 pm Monday through Friday (Drive thru)

No branches were closed in 2024 or 2025.



Hours of Operation at six retail locations:

Monday – Friday 9:00 am-5:00 pm (Charlottesville, Scottsville, Tysons Corner, Leesburg & State College)

Monday – Friday 10:00 am-3:00 pm (Boca Raton)

Credit and Deposit Services Offered

Credit Services

Real Estate Mortgages (Fixed or Adjustable Rate)

- Owner-Occupied First Mortgages
- Secondary Residence Mortgages
- Construction-to-Permanent Mortgages

Line of Credit

- Home Equity Line of Credit (HELOC)
Owner-Occupied & Second Homes

Consumer Loans

- Lot Loans
- CD-Secured Loans

Commercial Loans

- Various Collateralized Loans
- Various Unsecured Commercial Loans
- Small Business Administration Loans
- Land Acquisition and Development
- Commercial Construction

Deposit Services

Personal Checking Accounts

- Personal Checking Accounts
- Various Interest Checking Accounts
- Gold Checking Account
- Student Checking Account

Business Checking Accounts

- Small Business Checking Account
- Commercial Checking Account
- Business Interest Checking Account
- IOLTA Checking Account
- Community Checking Account

Personal Savings Accounts

- Personal Money Market
- Premium Money Market
- Personal Savings Account
- Youth Savings Account
- Health Savings Accounts

Business Savings Accounts

- Business Savings Account
- Business Money Market Account
- Business Premium Money Market
- Non-Profit Money Market

Time Investments

- Various Certificates of Deposit
- Individual Retirement Accounts

Treasury Management Services

- Promontory Certificate of Deposit Account, Checking, Savings ICS Registry Service (CDARS)
- Lock Box Services
- Merchant Card Services
- Cash Management Solutions
- Merchant Card Services
- Insured Cash Sweep

Additional Services:

- Debit and Credit Cards
- Cashier's Checks
- Safe Deposit Boxes available at the
Scottsville Retail Location

Alternative Delivery Systems:

- Available ATMs at 5 Retail Locations, Charlottesville, Scottsville, Tysons Corner, Leesburg, and State College, and, as standalone, deposit-taking ATMs, at 1416 P Street NW, Washington DC 20005
- Online Banking and Mobile Banking available to both consumer and commercial clients
- Consumer Online Deposit Account Opening
- Available Night Depositories at 5 retail locations
- Deposits by mail accepted at all 6 retail locations
- Available 24/7 Telebanking access
- Person to person (P2P) payment technology
- Mobile Wallet (SamsungPay, GooglePay, ApplePay)
- Text Banking
- Wires
- ACH
- Title and Escrow
- Check and ACH Positive Pay
- Remote Deposit Capture

Insurance Services Offered

- Personal Insurance
- Business Insurance
- Life Insurance

Wealth Management Services Offered

- Retirement
- Estate Strategy
- Tailored Wealth Management

Loan Production Offices

- **TYSONS CORNER, VA** 8607 Westwood Center Drive, Suite 440, Vienna, Virginia 22182
- **STATE COLLEGE, PA** 1965 Waddle Rd, State College, PA 16803

FEE SCHEDULE
Fees and Service Charges & Common Features



Revised 09/2023

FEES AND CHARGES. The following fees and charges may be assessed against your account:

Check printing fees vary by the style of check ordered.

Account Closed Before 90 Days, at closing	\$40.00
ATM Transactions (Non-ODNB Machine) 5 FREE ATM surcharges per statement cycle	\$0.00
ATM Transactions (Non-ODNB Machine) Surcharges in Excess of 5 per month per statement cycle, per withdrawal	\$2.00
ATM Transactions (ODNB Machine) - No Charge	\$0.00
Bond Coupon Collection, per coupon	\$10.00
Cashier's Checks, per check	\$6.00
Check Copies, per check	\$1.00
Collection Items, per item	\$20.00
Dormant Account Fee (12 months of Inactivity), per month	\$10.00
Excess Item Fee (Business Money Market Accounts), per item	\$10.00
Excess Item Fee (Business Savings Accounts), per item	\$3.00
Faxes, per page	\$0.50
Garnishments, each order	\$50.00
Levies, each order	\$50.00
Night Depository - Locked Bag with Keys, per bag with key	\$25.00
Night Depository - Zipper Deposit bag, per bag	\$5.00
Night Depository Key, per key	\$5.00
Notary Fee (Customers Only), per document	\$5.00
Overdraft - Funds Paid Charge (paid into overdraft), per item	\$35.00
Overdraft - Non-Sufficient Funds Charge (returned unpaid), per item	\$35.00
Overdraft - Uncollected Funds Charge, per item	\$35.00
Photocopies, per page	\$0.50
Prepackaged Currency, per \$1,000.00	\$1.00
Research Fees, per hour with 1 hour minimum	\$25.00
Rolled Coin, per roll	\$0.12
Safe Deposit Box Rental Fee - 10x10, per year	\$120.00
Safe Deposit Box Rental Fee - 3x10, per year	\$60.00
Safe Deposit Box Rental Fee - 3x5, per year	\$30.00
Safe Deposit Box Rental Fee - 5x10, per year	\$90.00
Statement Balancing, per hour with 1 hour minimum	\$25.00
Statement Copy with Checks, per statement	\$7.50
Statement Copy, per statement	\$5.00
Stop Payments, per item	\$30.00
Telephone Transfer, per transfer	\$5.00
Wire Fee - Incoming, per wire	\$15.00
Wire Fee - Outgoing Domestic, per wire	\$30.00
Wire Fee - Outgoing International, per wire	\$45.00

Additional fees for Commercial Treasury Services may apply.



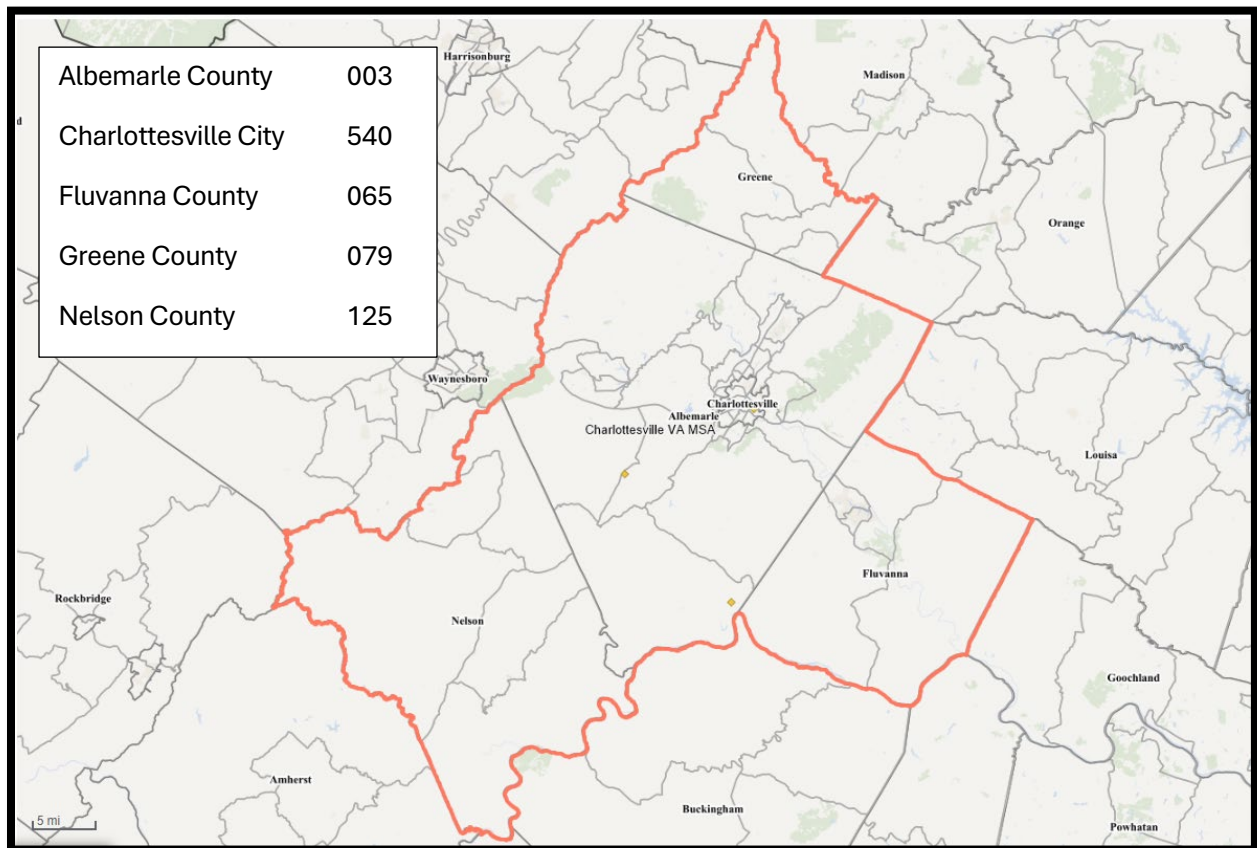


CRA ASSESSMENT AREA(S)

Old Dominion National Bank has identified five distinct markets to primarily serve:

Charlottesville, VA; Northern Virginia Region; DC Region; State College, PA; and Palm Beach, FL. Bank considers the assessment areas to be the Charlottesville Metropolitan Statistical Area (MSA); select counties and cities in the Arlington-Alexandria-Reston MSA; select counties and cities in the Washington-DC-MD MSA; the State College MSA, which is comprised of Centre County, PA; and the West Palm Beach-Boca Raton-Delray Beach, FL MSA, which is comprised of Palm Beach County, FL.

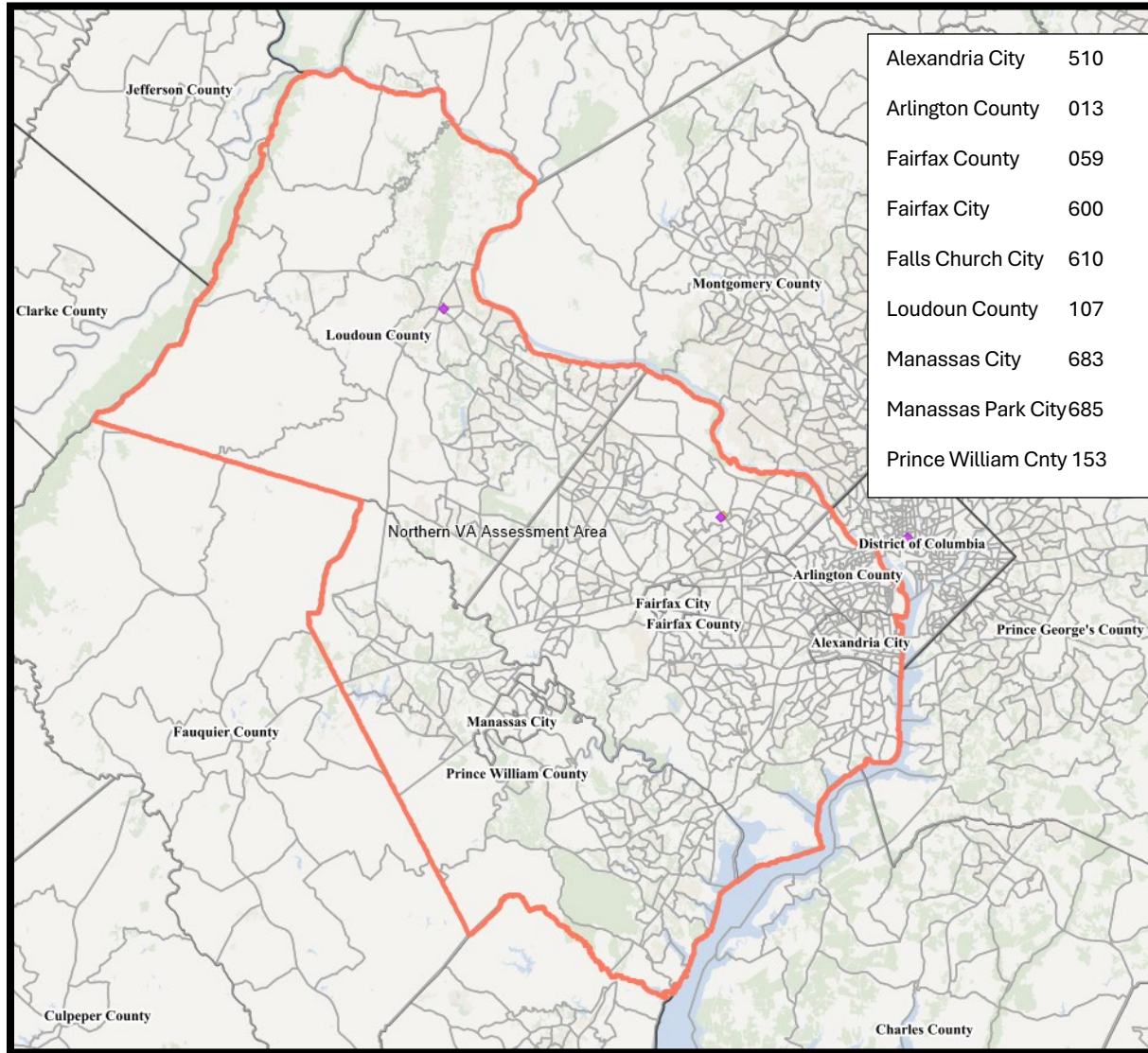
Charlottesville, VA Assessment Area



Census Tract Income Level Data: Charlottesville						
County, State	#	Low	Moderate	Middle	Upper	NA
Albemarle	29	0 / 0.0%	5 / 17.2%	12 / 41.4%	12 / 41.4%	0 / 0.0%
Greene	5	0 / 0.0%	3 / 60.0%	2 / 40.0%	0 / 0.0%	0 / 0.0%
Fluvanna	6	0 / 0.0%	1 / 16.7%	5 / 83.3%	0 / 0.0%	0 / 0.0%
Nelson	6	0 / 0.0%	3 / 50.0%	3 / 50.0%	0 / 0.0%	0 / 0.0%
Charlottesville City	12	2 / 16.7%	2 / 16.7%	5 / 41.7%	3 / 25.0%	0 / 0.0%
Total Census Tracts	58	2 / 3.4%	14 / 24.1%	27 / 46.6%	15 / 25.9%	0 / 0.0%

Source: www.ffiec.gov as of July 28, 2025

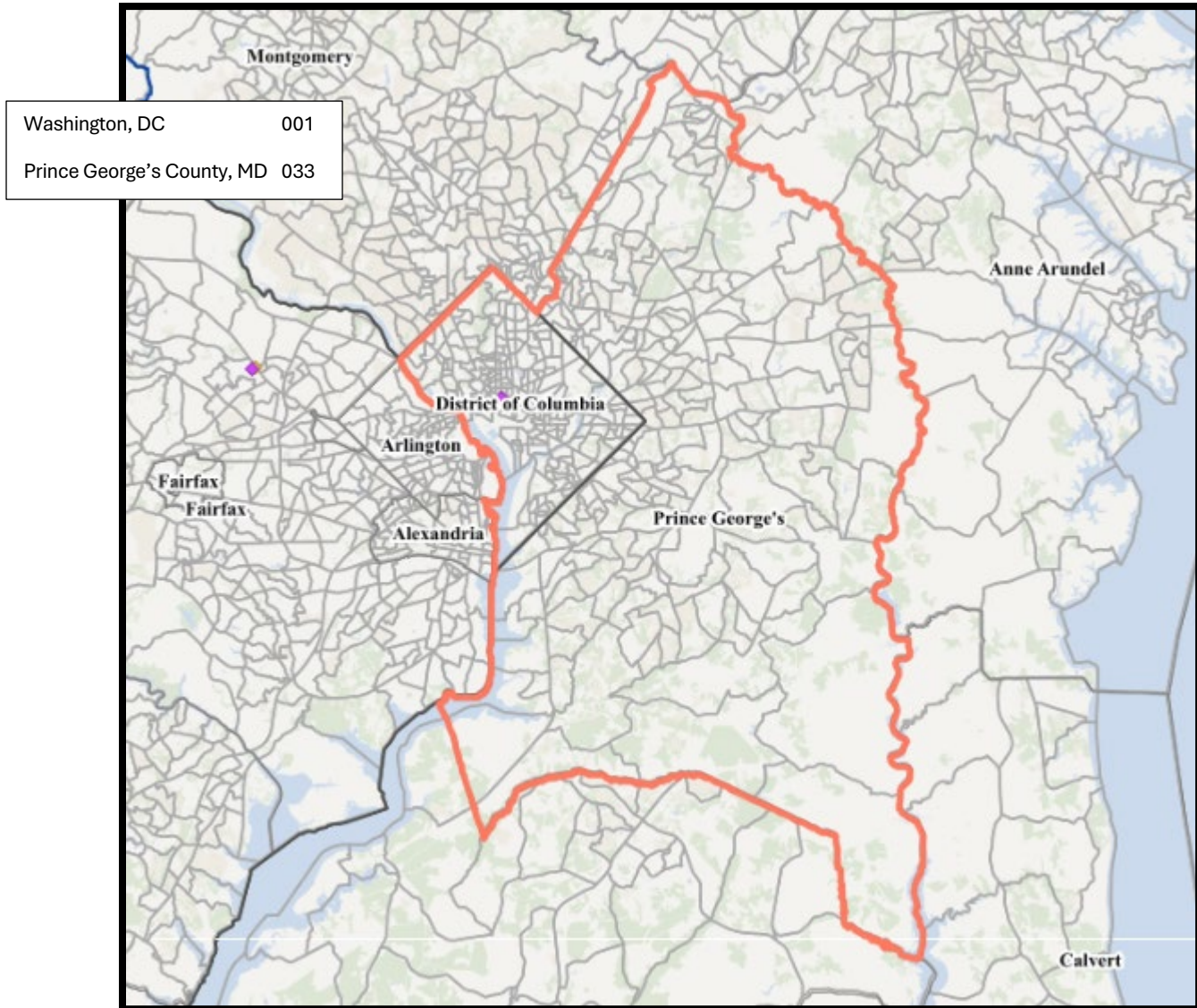
Northern Virginia Assessment Area



Census Tract Income Level Data: Northern Virginia

County, State	#	Low	Moderate	Middle	Upper	NA
Alexandria City, VA	48	9 / 18.8%	7 / 14.6%	12 / 25.0%	19 / 39.6%	1 / 2.1%
Arlington, VA	71	2 / 2.8%	7 / 9.9%	26 / 36.6%	31 / 43.7%	5 / 7.0%
Fairfax, VA	274	12 / 4.4%	48 / 17.5%	101 / 36.9%	109 / 39.8%	4 / 1.5%
Fairfax City, VA	5	0 / 0.0%	0 / 0.0%	4 / 80.0%	1 / 20.0%	0 / 0.0%
Falls Church City, VA	3	0 / 0.0%	0 / 0.0%	0 / 0.0%	3 / 100.0%	0 / 0.0%
Loudoun, VA	75	0 / 0.0%	6 / 8.0%	27 / 36.0%	40 / 53.3%	2 / 2.7%
Manassas City, VA	7	1 / 14.3%	5 / 71.4%	1 / 14.3%	0 / 0.0%	0 / 0.0%
Manassas Park City, VA	3	1 / 33.3%	1 / 33.3%	1 / 33.3%	0 / 0.0%	0 / 0.0%
Prince William, VA	93	9 / 9.7%	32 / 34.4%	39 / 41.9%	12 / 12.9%	1 / 1.1%
Total Census Tracts	579	34 / 5.9%	106 / 18.3%	211 / 36.4%	215 / 37.1%	13 / 2.2%

DC Region Assessment Area

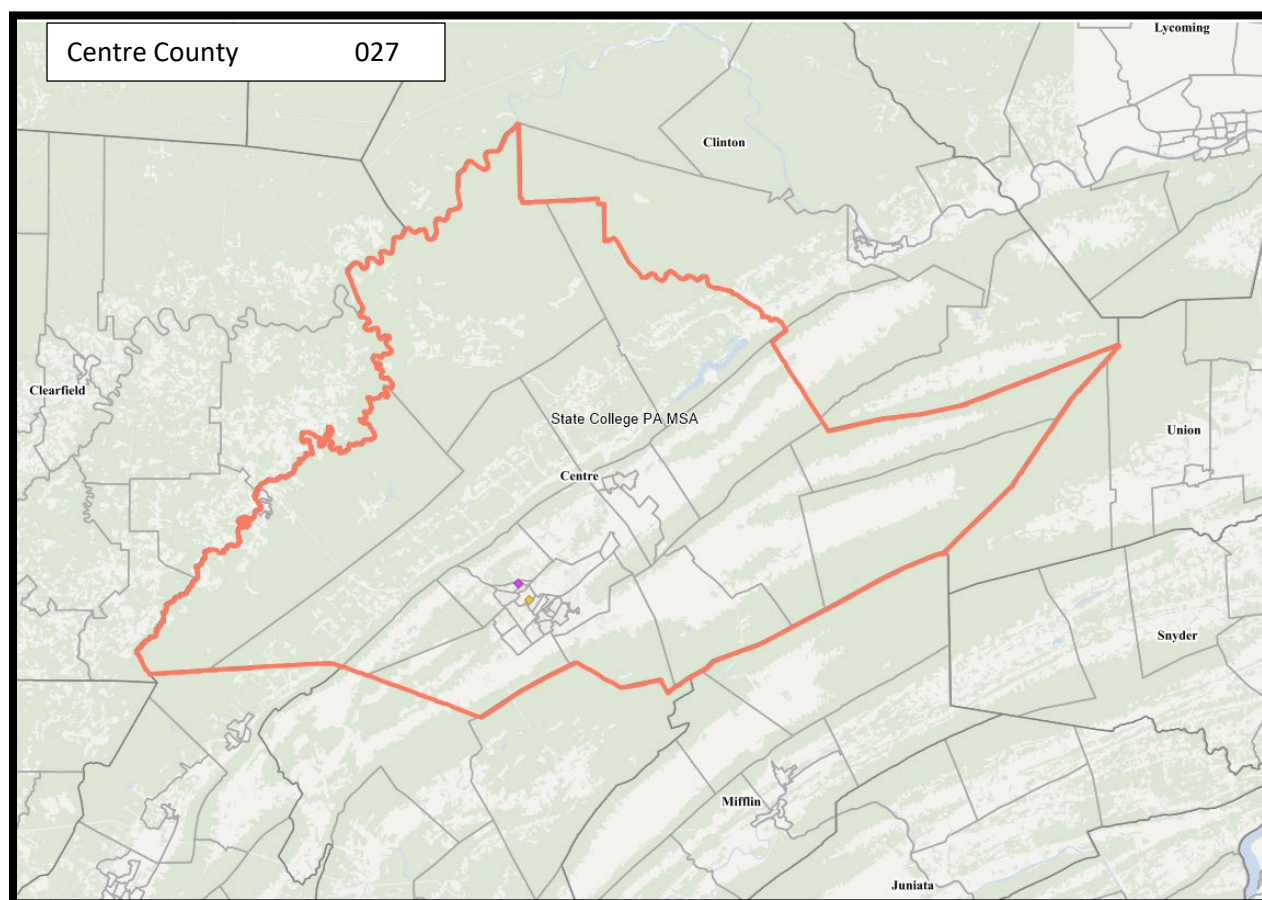


Census Tract Income Level Data: DC Region

County, State	#	Low	Moderate	Middle	Upper	NA
Washington, DC	206	41 / 19.9%	24 / 11.7%	30 / 14.6%	103 / 50.0%	8 / 3.9%
Prince George's, MD	214	9 / 4.2%	73 / 34.1%	86 / 40.2%	46 / 21.5%	0 / 0.0%
Total Census Tracts	420	50 / 11.9%	97 / 23.1%	116 / 27.6%	149 / 35.5%	8 / 1.9%

Source: www.ffiec.gov as of July 28, 2025

State College Assessment Area

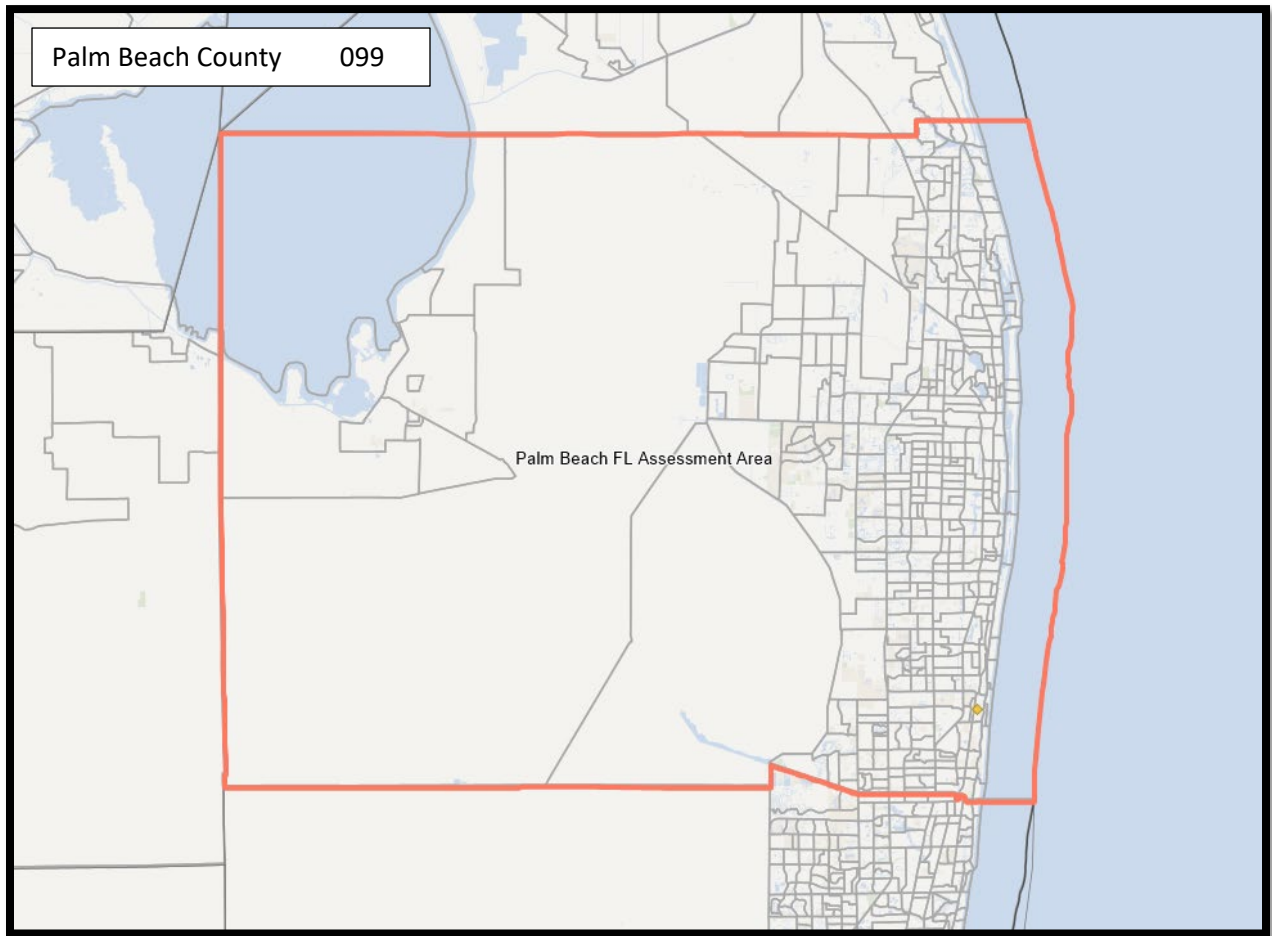


Census Tract Income Level Data: State College

County, State	#	Low	Moderate	Middle	Upper	NA
Centre County, VA	41	1 / 2.4%	8 / 19.5%	19 / 46.3%	9 / 22.0%	4 / 9.8%
Total Census Tracts	41	1 / 2.4%	8 / 19.5%	19 / 46.3%	9 / 22.0%	4 / 9.8%

Source: www.ffiec.gov as of July 23, 2025

Palm Beach, FL Assessment Area



Census Tract Income Level Data: Palm Beach

County, State	#	Low	Moderate	Middle	Upper	NA
Palm Beach, FL	373	25 / 6.7%	110 / 29.5%	98 / 26.3%	125 / 33.5%	15 / 4.0%
Total Census Tracts	373	25 / 6.7%	110 / 29.5%	98 / 26.3%	125 / 33.5%	15 / 4.0%

Source: www.ffiec.gov as of July 28, 2025



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