



PUBLIC DISCLOSURE

July 18, 2022

**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 major factors that support this rating include:

- The Lending Test rating for Old Dominion National Bank (hereinafter referred to as ODNB, bank, or institution) is based on the combined ratings of the state of Pennsylvania and the state of Virginia. The rating for the state of Virginia was given more weight as this state holds a greater percentage of bank deposits and loans for the evaluation period.
- The bank's loan-to-deposit (LTD) ratio is more than reasonable considering the bank's size, financial condition, and credit needs in its assessment areas (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, given the product lines offered by the bank.
- The bank's performance related to community development activities in the state of Virginia had a positive effect on the bank's rating in the state.

Loan-to-Deposit Ratio

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

ODNB's LTD ratio is calculated on a bank-wide basis covering the quarters as of March 31, 2019, through the quarter ended March 31, 2022. The bank's average quarterly LTD ratio for the 13 consecutive quarters since the previous CRA evaluation is 101.68 percent. This is above the average quarterly LTD ratio of 79.87 percent for similar asset-sized institutions in the AAs.. The bank's average quarterly LTD ratios ranged from a high of 119.49 percent to a low of 84.60 percent. The average quarterly LTD ratios for similar asset-sized banks ranged from a high of 99.19 percent, to a low of 34.78 percent.

During 2020, the bank's quarterly LTD ratio exceeded 100 percent due to elevated commercial loan volumes stemming from the bank's participation in the CARES Act Paycheck Protection Program (PPP), in efforts to support business owners during the COVID-19 pandemic. As PPP loans were forgiven in 2021, the bank's quarterly LTD returned to normal ranges, ending 2021, at 89.08 percent.

Lending in Assessment Area

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

The bank originated and purchased 69.6 percent of its total loans, by number, 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. The percentage of lending inside the AA had a positive impact on the OCC's analysis of geographic distribution of loans.

Table D - Lending Inside and Outside of the Assessment Area										
Loan Category	Number of Loans				Total	Dollar Amount of Loans \$(000s)				
	Inside		Outside			Inside		Outside		Total
	#	%	#	%		#	\$ (000)	%	\$ (000)	%
Home Mortgage	433	67.3	210	32.7	643	183,706	69.7	79,740	30.3	263,446
Small Business	154	79.0	41	21.0	195	39,684	76.9	11,920	23.1	51,604
Total	584	69.6	255	30.4	839	223,390	70.9	91,660	29.1	315,050

*Source: Bank Data for January 1, 2019, through December 31, 2021
Due to rounding, totals may not equal 100.0%*

Description of Institution

ODNB is a national bank with no subsidiaries or holding company and is chartered in North Garden, Virginia. ODNB's corporate activities are based in Tysons Corner, Virginia. As of December 31, 2021, ODNB reported total assets of \$837.5 million, and Tier One Capital of \$92.7 million.

ODNB has two state rating areas for this evaluation period which includes the states of Virginia and Pennsylvania. There are two AAs in the state of Virginia – the Charlottesville, VA Metropolitan Statistical Area (MSA), and the Washington-Baltimore-Arlington, DC-VA-MD-WV-PA Combined Statistical Area (CSA). There is one AA in the state of Pennsylvania – the State College, PA MSA. The bank is a multistate institution with five branches. Four branches are located in the state of Virginia, in Charlottesville, Tysons Corner, Scottsville, and North Garden. The remaining branch, in State College, Pennsylvania, opened in 2019. The bank has four deposit taking automated teller machines (ATM) at the North Garden, Scottsville, Tysons Corner, and State College Branch locations.

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. Additionally, ODNB also offers SBA 504 loans and 7a loans for small businesses. 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.odnbonline.com and <https://centre1st.com>.

As of December 31, 2021, the bank reported \$664.8 million in outstanding loans and had a net loan and leases to total assets ratio of 79.38 percent. The table below reflects the distribution of ODNB's loan portfolio as of December 31, 2021.

Distribution of Loan Portfolio*		
TYPE OF LOAN	Balance Outstanding (\$000s)	% OF TOTAL LOANS
Non-Farm/Non-Residential Real Estate	225,233	33.88
Commercial and Industrial	160,902	24.20
1-4 Family Residential Real Estate	120,590	18.14
Construction & Land Development	94,610	14.23
Multi-family Residential Real Estate	61,077	9.19
Loans secured by farmland	1,914	0.29
Other loans	250	0.04
Loans to Individuals	237	0.03
Total	\$664,813	100.00%

*Source: Schedule RC-C Part 1 – Loans and Leases as reported in the Consolidated Report of Condition and Income as of December 31, 2021.

Lending focus has shifted from Charlottesville, VA MSA AA to the Washington- Baltimore-Arlington, DC-MD-VA-WV-PA CSA, 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.

During 2020 and 2021, ODNB originated loans under the Paycheck Protection Program (PPP). This program was implemented by the U.S. Small Business Administration, and is a low-cost, qualifying forgivable loan program for small businesses to help cover payroll costs, interest on mortgages, rent, and utilities during the pandemic. In calendar year 2020, the bank originated 645 PPP loans totaling approximately \$209.4 million. In calendar year 2021, the bank originated 339 PPP loans totaling approximately \$91.5 million.

ODNB's participation in the PPP resulted in seventeen CRA qualified SBA loans totaling \$7.6 million. These loans were made for a qualified CD purpose and/or to non-profits providing CD activities and services to the AAs. Seven of the PPP loans totaling \$5.6 million were made to businesses located in low- or moderate-income (LMI) geographies. The table below includes the PPP loans qualified as CD loans in the AAs.

Paycheck Protection Program Loans				
Assessment Area	#	% of Total #	\$ (000's)	% of Total \$
Washington-Baltimore-Arlington, DC-MD-VA-WV-PA CSA	15	88.24	\$31,204	99.57
Charlottesville VA MSA	2	11.76	\$135	0.43
Totals	17	100.00	\$31,339	100.00

The bank was previously evaluated under the Community Reinvestment Act (CRA) on April 22, 2019, 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 bank’s lending performance was assessed based on the bank’s primary loan products of home mortgage and small business (SB) loans originated and purchased during the evaluation period of January 1, 2019, through December 31, 2021.

Small farm (SF) loans were not evaluated because the bank did not originate or purchase a sufficient volume of SF loans in the AAs. Multi-family loans were not considered in the lending test due to the low percentage of loan originations in all AAs.

Performance also included an assessment of community development (CD) activities from January 1, 2019, through December 31, 2021, an optional assessment given the bank’s asset size. CD activities included CD loans and qualified investments made in the evaluation period. Qualifying activities performed in response to the significant impact of the pandemic are addressed in this evaluation.

Selection of Areas for Full-Scope Review

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

ODNB operates in two states – Pennsylvania and Virginia. The state of Virginia carried the heaviest weighting because it contains 78.2 percent of the bank’s deposits, 75.0 percent of total branch offices, and 63.7 percent of total loans originated during the evaluation period. The state of Pennsylvania held 16.2 percent of the bank’s total deposits, 25.0 percent of the total branch offices, and 28.8 percent of total loans originated during the evaluation period.

The state ratings are based on performance in all bank AAs in that state. Refer to the “Scope” section under each state Rating section 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) or 195.28(c), respectively, in determining a national banks or federal savings associations (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 Bureau of Consumer Financial Protection, 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 Pennsylvania

CRA rating for the State of Pennsylvania¹: Satisfactory

The Lending Test is rated: Satisfactory

The major factors that support this rating include:

- The bank exhibits reasonable geographic distribution of loans in the AA.
- The bank exhibits reasonable distribution of loans to borrowers of different income levels.

Description of Institution's Operations in Pennsylvania

The bank has one AA within the state of Pennsylvania rating area located within the State College, PA MSA. The AA meets the requirements of the regulation and does not arbitrarily exclude low- or moderate-income (LMI) geographies.

State College, PA MSA

The bank identified the State College, PA MSA as its AA which included Centre County, Pennsylvania in its entirety. The State College, PA MSA AA is comprised of 31 census tracts (CTs) of which one is low-income, six are moderate-income, twelve are middle-income, eight are upper-income, and four are not assigned an income level. Based on the 2015 American Community Survey and the 2021 Dun & Bradstreet data, the AA has a population of 158 thousand people. The bank operates one branch, and one ATM in a middle-income CT in this AA. As of June 30, 2021, the institution's deposits in the AA represented 19.38 percent of its total bank deposits.

According to FDIC Summary of Deposits as of June 30, 2021, ODNB ranks 11th with a deposit market share of 2.40 percent, among the 17 institutions in the market. PNC Bank, N.A., First National Bank of Pennsylvania, Citizens Bank, N.A., and Truist, are the bank's major competitors with respective deposit market share of 24.86 percent, 19.48 percent, 8.51 percent, and 7.76 percent, respectively.

Based on the most recent 2021 Peer Mortgage Data, there were 300 lending institutions within the AA competing for mortgage applications. ODNB ranked 22nd, with a market share of 1.39 percent by count. The top five lenders, with combined market share of 28.73 percent by count are CBNA Wells Fargo Bank N.A, Northwest Bank, Rocket Mortgage, and First National Bank of PA.

¹ This rating reflects performance within the state. The statewide evaluations do not reflect performance in the parts of those states contained within a MMSA.

The information in the following tables provides demographic data for 2021 for the AA.

Table A – Demographic Information of the Assessment Area						
Assessment Area: State College PA MSA						
Demographic Characteristics	#	Low % of #	Moderate % of #	Middle % of #	Upper % of #	NA* % of #
Geographies (Census Tracts)	31	3.2	19.4	38.7	25.8	12.9
Population by Geography	157,823	3.3	20.9	40.6	22.9	12.2
Housing Units by Geography	64,489	0.2	24.5	44.4	24.0	6.9
Owner-Occupied Units by Geography	34,606	0.0	16.0	51.7	31.5	0.8
Occupied Rental Units by Geography	22,577	0.5	36.1	33.4	15.0	15.1
Vacant Units by Geography	7,306	0.4	28.6	43.3	16.5	11.1
Businesses by Geography	12,595	1.6	18.3	38.5	31.9	9.6
Farms by Geography	501	0.2	16.0	55.7	27.1	1.0
Family Distribution by Income Level	32,532	19.6	18.5	21.5	40.3	0.0
Household Distribution by Income Level	57,183	25.5	15.5	16.4	42.5	0.0
Median Family Income MSA - 44300 State College, PA MSA		\$74,118	Median Housing Value			\$208,908
			Median Gross Rent			\$927
			Families Below Poverty Level			6.5%
<i>Source: 2015 ACS and 2021 D&B Data. Due to rounding, totals may not equal 100.0%</i>						
<i>(*) The NA category consists of geographies that have not been assigned an income classification.</i>						

Employment and Economic Factors

According to the Bureau of Labor Statistics, the unemployment rates in the State College, PA MSA AA averaged 3.4, 5.9 and 4.6 percent for 2019, 2020, and 2021, respectively. During the height of the pandemic, unemployment rates increased as high as 9.9 percent in the AA. These unemployment rates were somewhat below those of the state of Pennsylvania, who reported averages of 4.5, 9.1, and 6.4 percent for 2019, 2020, and 2021, respectively. Pennsylvania's unemployment rate increased as high as 16.5 percent in April 2020, due to the pandemic. The national unemployment averages were comparable to those of the AA, at 3.7, 8.1, and 5.4 percent, for 2019, 2020, and 2021, respectively, with a sharp increase in April 2020, at 14.7 percent due to the pandemic. While 2020 showed dramatic increases in all respective scenarios, unemployment rates have steadily declined.

Moody's Analytics Report as of September 2021, indicated that the economic drivers for the area are Pennsylvania State University, and high-tech industries. The top employers for the area are Pennsylvania State University, Mount Nittany Health, Weis Markets, Inc., Geisinger Health, and Walmart, 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 six moderate-income geographies located within the 31 CTs. The majority of the CTs, 64.52 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 64 thousand total housing units in the AA, of which 53.66 percent are owner-occupied, 35.01 percent are rental-occupied, and 11.33 percent are vacant housing units. Housing units in low- or moderate- income geographies represent less than one percent and 24.46 percent, respectively, of total housing units in the AA, compared to 44.36 percent in middle-income geographies and 24.01 percent in upper-income geographies.

Home ownership in LMI geographies may be difficult due to high median housing prices compared to median family income. According to the 2015 American Census Survey (ACS) U.S. Census, the median housing value was \$208,908, and is relatively high for LMI households in the AA. The 2015 ACS U.S. Census reported the Weighted Average of Census MSA Median Family Income was \$74,118, which would result in a low-income household annual income of below \$37,059, and a moderate-income household annual income between \$37,059 and \$59,294. 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 21.85 percent of households in low-income geographies and 22.99 percent of households in moderate-income geographies.

Additional factors that may cause homeownership difficulties in LMI geographies include higher median age of housing within LMI geographies compared to middle- and upper- income geographies and a high percentage of renter occupied units in LMI geographies. Renter occupied units in low-income geographies total 80.41 percent of units while owner-occupied units account for 51.61 percent of units within the low-income geographies.

Community Contact

As part of our evaluation, we reviewed two community contacts completed by the Federal Reserve Board for an institution located in Centre County, PA. The first contact is a non-profit, non-denominational housing organization. The contact stated that homebuyers complete 350 sweat-equity hours and other requirements, pay for their homes and all upkeep, and maintain current payments on their properties. The contact stated that the organization may benefit from funding to purchase land that would be more desirable to residents, such as land lots in areas with the best school districts. The contact said that the organization is satisfied with the level of involvement from financial institutions, mentioning several retail banks in the county that provided support to the organization.

The second community contact is an independent, non-profit organization providing housing programs and supportive services to those in need throughout Centre County, PA. 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 communicated that the primary concern for the organization is the increasing number of people experiencing homelessness in Centre County. This increase has drained the organization's

emergency rental fund and put a strain on existing shelters. The contact stated that the organization can benefit from funding to cover the gap caused by rapidly increased home prices and the organization's stagnant budget. The organization has received financial help from financial institutions in the past and is seeking engagement from banks through marketing and outreach programs.

Scope of Evaluation in Pennsylvania

We performed a full-scope review of the State College, PA MSA AA for years 2019, 2020, and 2021. There is only one AA in the state of Pennsylvania. Refer to Appendix A for a list of all AAs under review.

The bank originated 149 total loans in the AA, totaling \$107.1 million, which represented 14.52 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 75 home mortgage loans, representing 50.34 percent of total loans originated in the AA; and the bank originated 65 small business loans, representing 43.62 percent of total loans originated in the AA. Small farm (SF) loans were not evaluated because the bank did not originate or purchase a sufficient volume of SF loans in the AA.

Lending Test

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

Conclusions for an Area Receiving a Full-Scope Review

Based on a full-scope review, the bank's performance in the State College, PA MSA AA is reasonable.

Distribution of Loans by Income Level of the Geography

The bank exhibits reasonable geographic distribution of loans in the State of Pennsylvania.

Home Mortgage Loans

Refer to Table O 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 excellent. The percentage of home mortgage loans to borrowers in moderate-income CTs exceeds the percentage of owner-occupied housing units and the percentage of aggregate loans. The AA did not include any low-income CTs.

Small Loans to Businesses

Refer to Table Q 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 and purchases of small loans to businesses. The analysis was based on the judgmental sample of small loans to businesses in the AA.

The geographic distribution of small loans to businesses is poor, based on the analysis of the sample of small loans to businesses. The bank did not originate loans to borrowers in low-income tracts. The percentage of small loans to businesses in moderate-income CTs is well below the percentage of businesses and the aggregate. The low percentage of businesses in low-income CTs may impact the ability to generate loans in these geographies. We also considered the percentage of loans made in the CTs with no income level designation. Approximately 10 percent of businesses are in no-income CTs with 3.8 percent of bank loans made in these CTs.

Lending Gap Analysis

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

Distribution of Loans by Income Level of the Borrower

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

Home Mortgage Loans

Refer to Table P 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. The percentage of home mortgage loans to moderate-income borrowers is below the percentage of moderate-income families and is somewhat below the aggregate.

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 R 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.

In evaluating small business lending activity, the lack of borrower revenue information for the PPP loans was considered. Because SBA underwriting guidelines for PPP loans did not require analysis of borrower revenue information, ODNB did not collect it for these loans.

The borrower distribution of small loans to businesses is reasonable.

The percentage of small loans to businesses with revenues of \$1 million or less is well below the percentage of businesses and near to the aggregate. We noted that the percentage of small loans to businesses with revenues not available is near to the percentage of businesses with revenues not available.

We performed a separate analysis to exclude PPP loans without gross annual revenues and found that there are 19 loans to small businesses. Of the 19 loans, we found that 11 of the loans, or 57.9 percent, are to businesses with revenues equal to or below \$1 million. Eight of the loans, or 42.1 percent are to businesses with annual gross revenue above \$1 million. The adjusted percentage of loans to borrowers with revenue equal to or below \$1 million is below the percent of businesses in the MSA but exceeds the aggregate.

Responses to Complaints

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

State Rating

State of Virginia

CRA rating for the State of Virginia²: Satisfactory

The Lending Test is rated: Satisfactory

The major factors that support this rating include:

- The bank exhibits reasonable geographic distribution of loans in the AA.
- The bank exhibits reasonable distribution of loans to borrowers of different income levels.
- The bank exhibits reasonable responsiveness to community development needs in the state through community development loans and qualified investments, considering the bank's capacity and the need and availability of such opportunities for community development in the bank's AA. Performance related to community development activities had a neutral effect on the bank's rating in the state.

Description of Institution's Operations in Virginia

ODNB has identified Charlottesville, VA MSA #16820 as its AA in the state of Virginia. The AA includes the city of Charlottesville, and the counties of Albemarle, Fluvanna, Green, and Nelson. The AA consists of 44 CTs, consisting of two low-income geographies, 12 moderate-income geographies, 19 middle income geographies, 10 upper-income geographies, and one CT not assigned an income level. The AA consists of entire cities and counties and does not arbitrarily exclude low or moderate-income tracts.

The bank has two full-service branches and one limited-service branch in the AA. There are no stand-alone ATMs in the Charlottesville MSA AA. The North Garden branch offers drive-through services and an ATM, and is located in an upper-income CT in Albemarle County. The Scottsville branch offers drive-through services and an ATM and is located in a moderate-income CT in Albemarle County. The bank closed the Charlottesville branch located at 1100 High Street, Suite 216, Charlottesville, Albemarle County, Virginia as of May 21, 2021. The branch was closed because the bank experienced very little growth in loans and deposits over the five-year life of the lease; the branch was a limited-service branch without an ATM or drive-through capability; and the bank's two other branches in the area are sufficient to meet the credit needs of the Charlottesville community. Hours of operation for all branches is 9 a.m. to 5 p.m. Monday through Friday. No branches have Saturday hours.

ODNB faces considerable competition in the Charlottesville, VA MSA AA, including some large, regional, and national institutions. According to FDIC Summary of Deposits as of June 30, 2021, ODNB ranked ninth with a deposit market share of 1.06 percent, or \$70.0 million among the 16 institutions in the Charlottesville, VA MSA AA. Bank of America, N.A., Truist Bank, Wells Fargo Bank, N.A., Virginia National Bank, and Atlantic Union Bank, are the bank's major competitors

² This rating reflects performance within the state. The statewide evaluations do not reflect performance in the parts of those states contained within a MMSA.

with respective deposit market share of 24.23 percent, 22.15 percent, 18.95 percent, 11.49 percent, and 11.37 percent, respectively.

The information in the following table provides demographic data for the AA for the Year 2021.

Charlottesville, VA MSA AA

Table A – Demographic Information of the Assessment Area						
Assessment Area: Charlottesville VA MSA						
Demographic Characteristics	#	Low % of #	Moderate % of #	Middle % of #	Upper % of #	NA* % of #
Geographies (Census Tracts)	44	4.5	27.3	43.2	22.7	2.3
Population by Geography	208,002	4.4	22.8	47.0	23.9	1.8
Housing Units by Geography	91,983	4.3	23.3	48.9	23.4	0.1
Owner-Occupied Units by Geography	51,220	2.7	16.9	54.5	26.0	0.0
Occupied Rental Units by Geography	28,726	7.7	31.8	38.5	21.8	0.1
Vacant Units by Geography	12,037	3.3	30.5	50.2	16.0	0.0
Businesses by Geography	25,595	3.8	17.4	42.6	36.2	0.1
Farms by Geography	1,103	1.4	18.1	57.0	23.5	0.0
Family Distribution by Income Level	49,042	19.8	16.8	21.0	42.4	0.0
Household Distribution by Income Level	79,946	23.9	15.9	17.8	42.4	0.0
Median Family Income MSA - 16820 Charlottesville, VA MSA		\$78,548	Median Housing Value			\$286,065
			Median Gross Rent			\$1,027
			Families Below Poverty Level			7.3%

Source: 2015 ACS and 2021 D&B Data. Due to rounding, totals may not equal 100.0%
 (*) The NA category consists of geographies that have not been assigned an income classification.

Based on the most recent 2021 Peer Mortgage Data, there were 470 lending institutions within the AA competing for mortgage applications. ODNB ranked 98th, with a market share of 0.13 percent by count. The top five lenders, with combined market share of 48.4 percent by count are Rocket Mortgage, Truist Bank, First Heritage Mortgage, LLC, Wells Fargo Bank N.A., and Freedom Mortgage Corporation.

Employment and Economic Factors

According to the Bureau of Labor Statistics, the unemployment rates in the Charlottesville VA MSA AA averaged 2.5, 5.7 and 3.4 percent for 2019, 2020, and 2021, respectively. During the height of the pandemic, unemployment rates increased as high as 10.0 percent in the AA. These unemployment rates were somewhat below those of the state of Virginia, who reported averages of 2.8, 6.2, and 3.9 percent for 2019, 2020, and 2021, respectively. Virginia's unemployment rate increased as high as 11.6 percent in April 2020 due to the pandemic. The national unemployment averages were somewhat higher than those of the AA, at 3.7, 8.1, and 5.4 percent, for 2019, 2020, and 2021, respectively, with a sharp increase in April 2020 at 14.7 percent due to the pandemic.

While 2020 showed dramatic increases in all respective scenarios, unemployment rates have steadily declined.

We obtained economic data for the Charlottesville, VA MSA from the Moody's Analytics Report as of August 2021. This report indicated that the economic drivers for the area are University of Virginia (UVA) and defense spending. Charlottesville job growth will track the state and national averages over the short run. Lukewarm income growth will be a hurdle for most consumer industries in the AA, but healthcare will keep an edge thanks to strong demand and UVA Health. Longer term, stability from UVA and favorable population trends will ensure Charlottesville, VA MSA is an average performer. The top employers for the area are University of Virginia, UVA Health Services Foundation, Sentara Hospital, State Farm Mutual Automobile Insurance, and the U.S. Department of Defense.

Housing

The Charlottesville, VA MSA provides limited opportunity to lend to LMI geographies within the AA. There are two low-income geographies and 12 moderate-income geographies located within the 44CTs. The majority of the CTs, 65.91 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 91.9 thousand total housing units in the AA, of which 55.68 percent are owner-occupied, 31.23 percent are rental-occupied, and 13.09 percent are vacant housing units. Housing units in low- or moderate- income geographies represent 2.66 percent and 16.89 percent, respectively, of total housing units in the AA, compared to 54.47 percent in middle-income geographies and 25.95 percent in upper-income geographies.

Home ownership in LMI geographies may be difficult due to high median housing prices compared to median family income. According to the 2015 ACS U.S. Census, the median housing value was \$286,065 and is relatively high for LMI households in the AA. The 2015 ACS U.S. Census reported the Weighted Average of Census MSA Median Family Income was \$78,548, which would result in a low-income household annual income of below \$39,274, and a moderate-income household annual income between \$39,274 and \$62,837. These income levels could make it difficult to afford housing at the median housing value in this AA for LMI borrowers.

Additional factors that may cause homeownership difficulties in LMI geographies include higher median age of housing within LMI geographies compared to middle- and upper- income geographies and a high percentage of renter occupied units in LMI geographies. Renter occupied units in low-income geographies total 55.77 percent of units while owner-occupied units account for 42.59 percent of units within the low-income geographies.

Community Contacts

As part of the evaluation of ODNB, we reached out to several potential community contacts for an assessment of the local market area and the community development needs that are most needed for low- and moderate-income, and at-risk communities. We contacted a local community organization for comment but were unable to speak directly with a representative of the organization. However, based on upon a review of the organization's impact report for 2020–2021,

we determined affordable housing, construction and renovation projects for low-income homeowners, non-profit organizations, and small business owners were primary needs in the AA. The organization completed 22 projects in 2020-2021, that supported 8,000 local residents, twelve non-profit organizations, four low-income homeowners, and six small businesses.

Scope of Evaluation in Virginia

We performed a full-scope review of the Charlottesville, VA MSA AA for years 2019, 2020, and 2021. A limited scope review was performed for the Washington-Baltimore-Arlington, DC-MD-VA-WV-PA CSA AA for the same evaluation period. Refer to Appendix A for a list of all AAs under review.

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.

The bank originated 289 total loans in the AAs, totaling \$224.8 million, which represented 30.50 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 Charlottesville, VA MSA AA. According to internal lending data, the bank originated 22 home mortgage loans, representing 50 percent of total loans originated in the AA; and the bank originated 22 small business loans, representing 50 percent of total loans originated in the AA. Small farm (SF) and multi-family loans were not evaluated because the bank did not originate or purchase a sufficient volume of SF or multi-family loans in the AA.

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 performance in the Charlottesville, VA MSA AA is reasonable.

Distribution of Loans by Income Level of the Geography

The bank exhibits reasonable geographic distribution of loans in the State.

Home Mortgage Loans

Refer to Table O 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.

ODNB's distribution of home mortgage loans within the Charlottesville, VA MSA AA shows excellent distribution in moderate-income geographies. The percentage of home mortgage loans in moderate-income CTs exceeded both the aggregate percentage of loans by lenders in moderate-

income CTs and the percentage of owner-occupied housing units in moderate-income CTs. The bank did not originate any home mortgage loans in low-income tracts. This is reasonable due to the competitive loan market, and low percentage of low-income owner-occupied housing units (2.7 percent) in the AA.

According to 2021 Peer Mortgage data, 99 lenders originated home mortgage loans in low-income CTs in the AA. The top five home mortgage lenders in low-income CTs were First Heritage Mortgage, LLC, Rocket Mortgage, Truist Bank, Wells Fargo Bank, N.A., and United Wholesale Mortgage, and held a combined loan market share of 30.02 percent in low-income CTs in the AA.

Small Loans to Businesses

Refer to Table Q 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.

Our loan sample did not contain a sufficient volume of small loans to businesses in the Charlottesville, VA MSA AA to conduct a meaningful analysis.

Lending Gap Analysis

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

Distribution of Loans by Income Level of the Borrower

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

Home Mortgage Loans

Refer to Table P 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.

The percentage of home mortgage loans to low-income borrowers is well below the percentage of families and equal to the aggregate lending in the AA. The percentage of home mortgage loans to moderate-income borrowers is near to the percentage of families and the aggregate lending in the AA. As previously stated in the Housing section for the Charlottesville VA MSA AA, home ownership in LMI geographies may be difficult due to high median housing prices compared to median family income. According to the 2015 ACS U.S. Census, the median housing value was \$286,065, and the median family income for low-income borrowers was less than \$39,274, making it difficult for low-income borrowers to afford housing in the AA.

Small Loans to Businesses

Refer to Table R 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.

Our loan sample did not contain a sufficient volume of small loans to businesses in the Charlottesville, VA MSA AA to conduct a meaningful analysis.

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 Washington-Baltimore-Arlington, DC-MD-VA-WV-PA CSA AA is consistent with the bank's overall performance under the Lending Test in the full scope area.

Community Development

Based on full-scope and limited-scope reviews, the bank exhibits reasonable responsiveness to community development needs in the state through community development (CD) loans, as appropriate, considering the bank's capacity and the need and availability of such opportunities for CD in the bank's AA(s). Performance related to CD activities had a positive effect on the bank's rating in the state of Virginia. There were no CD loans or investments made in the Charlottesville, VA MSA AA during the evaluation period.

Number and Amount of Community Development Loans

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

Community Development Loans				
Assessment Area	Total			
	#	% of Total #	\$(000's)	% of Total \$
Washington-Baltimore-Arlington, DC-MD-VA-WV-PA CSA	11	100.00	\$20,960	100.00

The bank originated eleven CD loans totaling \$21.0 million, or 22.60 percent of tier one capital, that have a purpose, mandate, or function that directly benefits the Washington-Baltimore-Arlington, DC-MD-VA-WV-PA CSA. The bank continues to originate CD loans for affordable housing. The bank's affordable housing loans consist primarily of loans to properties participating in the DC Housing Choice Voucher Program (DC-HCVP). The program provides rental assistance to low- and moderate-income renters.

The four largest CD loans originated by the bank are listed below.

1. A \$5.80 million loan to refinance a 24-unit multi-family affordable housing property that participates in the DC-HCVP in a low-income CT.
2. A \$2.75 million loan to refinance a 12-unit multi-family affordable housing property that participates in the DC-HCVP in a low-income CT.
3. A \$2.55 million loan to refinance two multi-family housing properties totaling 14 units that participate in the DC-HCVP in a moderate-income CT.
4. A \$2.22 million loan to acquire and renovate an eight-unit multi-family affordable housing property that participates in the DC-HCVP in a low-income CT.

Number and Amount of Qualified Investments

Qualified Investments										
Assessment Area	Prior Period*		Current Period		Total				Unfunded Commitments**	
	#	\$(000's)	#	\$(000's)	#	% of Total #	\$(000's)	% of Total \$	#	\$(000's)
Washington-Baltimore-Arlington, DC-MD-VA-WV-PA CSA	0	0	1	64	1	20.0	64	3.9	0	0
Broader, statewide, or regional area	0	0	4	1,585	4	80.0	1,585	96.1	0	0
Total	0	0	5	1,649	5	100.0	1,649	100.0	0	0

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

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

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

The bank demonstrated reasonable responsiveness to community development needs through investments. The investments made during the evaluation period represented 1.8 percent of tier one capital.

The CD investments in the broader, statewide, or regional area promoted 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 AA and the Washington-Baltimore-Arlington, DC-MD-VA-WV-PA CSA.

* '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 MSAs and non-MSAs 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:	01/01/2019 – 12/31/2021	
Bank Products Reviewed:	Home Mortgage Loans and Small Business Loans Community Development Loans and Investments	
Affiliate(s)	Affiliate Relationship	Products Reviewed
None	None	None
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 31 census tracts in Centre County in the state of Pennsylvania.
Virginia		
Charlottesville VA MSA	Full-scope	All 44 census tracts in the city of Charlottesville, and the counties of Albemarle, Fluvanna, Green, and Nelson in the state of Virginia.
Washington-Baltimore-Arlington, DC-MD-VA-WV-PA CSA	Limited-scope	All 1,132 census tracts 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.

Appendix B: Summary of State Ratings

RATINGS: OLD DOMINION NATIONAL BANK	
Overall Bank:	Lending Test Rating
Old Dominion National Bank	Satisfactory
State:	
Pennsylvania	Satisfactory
Virginia	Satisfactory

Appendix C: Definitions and Common Abbreviations

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

Appendix D: Tables of Performance Data

Content of Standardized Tables

A separate set of tables is provided for each state. All multistate metropolitan statistical areas, if applicable, are presented in one set of tables. References to the “bank” include activities of any affiliates that the bank provided for consideration (refer to appendix A: Scope of the Examination). For purposes of reviewing the Lending Test tables, the following are applicable: (1) purchased are treated as originations; and (2) “aggregate” is the percentage of the aggregate number of reportable loans originated and purchased by all HMDA or CRA-reporting lenders in the MMSA/assessment area. Deposit data are compiled by the FDIC and are available as of June 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 O. 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 P. Assessment Area Distribution of Home Mortgage Loans by Income Category of the Borrower** - Compares the percentage distribution of the number of loans originated and purchased by the bank to low-, moderate-, middle-, and upper-income borrowers to the percentage distribution of families by income level in each MMSA/assessment area. The table also presents aggregate peer data for the years the data is available.
- Table Q. 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 assessment area.
- Table R. 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 O: Assessment Area Distribution of Home Mortgage Loans by Income Category of the Geography																				2019-21	
Assessment Area:	Total Home Mortgage Loans				Low-Income Tracts			Moderate-Income Tracts			Middle-Income Tracts			Upper-Income Tracts			Not Available-Income Tracts				
	#	\$ (,000)	% of Total	Overall Market (,000)	% 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	21	5,216	4.8	12,928	2.7	0.0	2.9	16.9	28.6	11.5	54.5	38.1	54.3	26.0	33.3	31.3	0.0	0.0	0.0		
State College PA MSA	101	28,491	23.3	5,597	0.0	0.0	0.0	16.0	18.8	14.6	51.7	23.8	45.8	31.5	55.4	38.4	0.8	2.0	1.2		
Washington-Baltimore-Arlington-DC-MD-VA-WV-PA CSA	311	150,000	71.8	382,422	3.9	1.9	3.6	16.0	7.1	13.1	33.7	24.7	31.6	46.2	65.9	51.5	0.2	0.3	0.2		
Total	433	183,707	100.0	400,947	3.8	1.4	3.5	16.1	10.8	13.1	35.1	25.2	32.5	44.9	61.9	50.6	0.2	0.7	0.2		

*Source: 2015 ACS; 01/01/2019 - 12/31/2021 Bank Data, 2020 HMDA Aggregate Data, "--" data not available. Due to rounding, totals may not equal 100.0%
 OLD DOMINION NATIONAL BANK (10000024730) excluded from Aggregate*

Table P: Assessment Area Distribution of Home Mortgage Loans by Income Category of the Borrower																				2019-21	
Assessment Area:	Total Home Mortgage Loans				Low-Income Borrowers			Moderate-Income Borrowers			Middle-Income Borrowers			Upper-Income Borrowers			Not Available-Income Borrowers				
	#	\$ (,000)	% of Total	Overall Market (,000)	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate		
Charlottesville VA MSA	21	5,216	4.8	12,928	19.8	4.8	4.8	16.8	14.3	15.5	21.0	47.6	19.5	42.4	28.6	43.1	0.0	4.8	17.0		
State College PA MSA	101	28,491	23.3	5,597	19.6	1.0	6.7	18.5	13.9	15.7	21.5	25.7	24.1	40.3	56.4	41.6	0.0	3.0	11.8		
Washington-Baltimore-Arlington, DC-MD-VA-WV-PA CSA	311	150,000	71.8	382,422	21.9	2.3	4.7	16.1	10.9	14.5	19.6	18.0	21.4	42.5	63.0	38.2	0.0	5.9	21.2		
Total	433	183,707	100.0	400,947	21.7	2.1	4.8	16.2	11.8	14.6	19.7	21.2	21.3	42.5	59.8	38.4	0.0	5.1	20.9		

*Source: 2015 ACS; 01/01/2019 - 12/31/2021 Bank Data, 2020 HMDA Aggregate Data, "--" data not available. Due to rounding, totals may not equal 100.0%
 OLD DOMINION NATIONAL BANK (10000024730) excluded from Aggregate*

Table Q: Assessment Area Distribution of Loans to Small Businesses by Income Category of the Geography																		2019-21		
Assessment Area:	Total Loans to Small Businesses				Low-Income Tracts			Moderate-Income Tracts			Middle-Income Tracts			Upper-Income Tracts			Not Available-Income Tracts			
	#	\$ (,000)	% of Total	Overall Market (,000)	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	Aggregate	
Charlottesville VA MSA	15	849	9.7	5,027	3.8	0.0	4.4	17.4	33.3	16.0	42.6	33.3	42.9	36.2	33.3	35.7	0.1	0.0	0.9	
State College PA MSA	26	8,379	16.9	2,635	1.6	0.0	0.2	18.3	7.7	17.4	38.5	46.2	41.7	31.9	42.3	29.4	9.6	3.8	11.4	
Washington-Baltimore-Arlington-DC-MD-VA-WV-PA CSA	113	28,440	73.4	144,245	4.9	0.9	4.3	18.2	11.5	17.4	32.9	21.2	32.5	43.5	66.4	45.1	0.6	0.0	0.7	
Total	154	37,668	100.0	151,907	4.8	0.6	4.2	18.1	13.0	17.3	33.3	26.6	33.0	43.0	59.1	44.5	0.7	0.6	0.9	

*Source: 2021 D&B Data; 01/01/2019 - 12/31/2021 Bank Data; 2020 CRA Aggregate Data, "--" data not available. Due to rounding, totals may not equal 100.0%
OLD DOMINION NATIONAL BANK (10000024730) excluded from Aggregate*

Table R: Assessment Area Distribution of Loans to Small Businesses by Gross Annual Revenues												2019-21	
Assessment Area:	Total Loans to Small Businesses				Businesses with Revenues <= 1MM			Businesses with Revenues > 1MM		Businesses with Revenues Not Available			
	#	\$ (,000)	% of Total	Overall Market (,000)	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	% Businesses	% Bank Loans		
Charlottesville VA MSA	15	849	9.7	4,633	86.7	40.0	50.2	4.3	20.0	9.0	40.0		
State College PA MSA	26	8,379	16.9	2,148	81.5	42.3	46.2	5.0	30.8	26.9	23.8		
Washington-Baltimore-Arlington, DC-VA-MD-WV CSA	113	28,440	73.4	136,320	87.2	13.3	49.9	4.9	38.1	7.8	48.7		
Total	154	37,668	100.0	143,101	87.1	20.8	49.8	4.9	35.1	8.0	44.2		

*Source: 2019 D&B Data; 01/01/2019 - 12/31/2019 Bank Data; 2019 CRA Aggregate Data, "--" data not available. Due to rounding, totals may not equal 100.0%
OLD DOMINION NATIONAL BANK (10000024730) excluded from Aggregate*