



**LARGE BANK**

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Comptroller of the Currency  
Administrator of National Banks

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Washington, DC 20219

## **Public Disclosure**

May 7, 2001

# **Community Reinvestment Act Performance Evaluation**

**Wells Fargo Bank Ohio, NA  
Charter Number: 22697**

**114 East Main Street  
Van Wert, Ohio 45891-6772**

**Office of the Comptroller of the Currency  
Large Bank Supervision  
250 E Street SW  
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**NOTE: 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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## General Information

*The Community Reinvestment Act (CRA) requires each federal financial supervisory agency to use its authority, when examining financial institutions subject to its supervision, to assess the 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. Upon conclusion of such examination, the agency must prepare a written evaluation of the institution's record of meeting the credit needs of its community.*

*This document is an evaluation of the CRA performance of **Wells Fargo Bank Ohio, National Association**, prepared by the **Office of the Comptroller of the Currency (OCC)**, the institution's supervisory agency, as of **May 7, 2001**. The agency evaluates performance in assessment area(s), as they are delineated by the institution, rather than individual branches. This assessment area evaluation may include the visits to some, but not necessarily all of the institution's branches. The agency rates the CRA performance of an institution consistent with the provisions set forth in Appendix A to 12 CFR Part 25.*

## Definitions and Common Abbreviations

The following terms and abbreviations are used throughout this Performance Evaluation. 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 by another company. A company is under common control with another company if both companies are directly or indirectly controlled by the same company. A bank subsidiary is controlled by the bank and is, therefore, an affiliate.

**Block Numbering Area (BNA)** - Statistical subdivisions of counties in which census tracts have not been established. BNAs have been established by the United States Census Bureau in conjunction with state agencies.

**Census Tract (CT)** - Small, locally defined statistical areas within metropolitan statistical areas. These areas are determined by the United States Census Bureau in an attempt to group homogenous populations. A CT has defined boundaries per ten-year census and an average population of 4,000.

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

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

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

**Geography** - A census tract or a block numbering area delineated by the United States Bureau of the Census in the most recent decennial census.

**Home Mortgage Disclosure Act (HMDA)** - The statute that requires certain mortgage lenders that do business or have banking offices in a metropolitan statistical area to file annual summary reports of their mortgage lending activity. The reports include such data as the race, gender, and the income of applicants, the amount of loan requested, and the disposition of the application (e.g., approved, denied, withdrawn).

**Home Mortgage Loans** - Such loans include home purchase and home improvement loans, as defined in the HMDA regulation. This definition also includes multifamily (five or more families) dwelling loans, loans for the purchase of manufactured homes, and refinancing of home improvement and home purchase loans.

**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, branch distribution).

**Low-Income** - Income levels that are less than 50% of the median family income.

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

**Metropolitan Statistical Area (MSA)** - Area defined by the Director of the United States Office of Management and Budget. MSAs consist of one or more counties, including large population centers and nearby communities that have a high degree of interaction.

**Middle-Income** - Income levels that are at least 80% and less than 120% of the MFI.

**Moderate-Income** - Income levels that are at least 50% and less than 80% of the MFI.

**Small Business Loans** - Loans with original amounts of \$1 million or less that are: (1) secured by non-farm nonresidential properties or (2) commercial and industrial loans to U.S. addresses.

**Small Farm Loans** - Loans with original amounts of \$500 thousand or less that are: (1) secured by farmland or (2) to finance agricultural production and other loans to farmers.

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

**Upper-Income** - Income levels that are 120% or more of the MFI.

## Overall CRA Rating

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

The following table indicates the performance level of Wells Fargo Bank Ohio, National Association (WFOH), with respect to the Lending, Investment, and Service Tests:

Performance Levels	Wells Fargo Bank Ohio, N.A. Performance Tests		
	Lending Test*	Investment Test	Service Test
Outstanding	X	X	
High Satisfactory			X
Low Satisfactory			
Needs to Improve			
Substantial Noncompliance			

\* The Lending Test is weighted more heavily than the Investment and Service Tests when arriving at an overall rating.

The major factors that support this rating include:

- An excellent level of lending activity characterized by a good concentration in the assessment area and an excellent level of CD lending.
- An excellent distribution of lending by income level of the borrower. The borrower distribution is favorably affected by the use of flexible lending programs.
- An excellent level of investments which meet important community development needs.
- An adequate distribution in the bank's product delivery system.
- An excellent level of community development services that are responsive to identified needs in the bank's assessment area.

## Description of Institution

Wells Fargo Bank Ohio, National Association (WFOH) is a small, rural bank that has been in operation since 1903. The bank is headquartered in Van Wert, Ohio and conducts business through one banking office and two ATMs. WFOH was formerly known as Norwest Bank Ohio, NA. Wells Fargo & Company changed the name in 2000.

WFOH is an intrastate bank. It does not have any subsidiaries. WFOH is owned by Wells Fargo & Company (WFC), an interstate multi-bank holding company. WFC is the fourth largest bank holding company in the United States, with consolidated total assets of \$272 billion as of December 31, 2000. WFC conducts business through more than 4,300 offices and 6,200 ATM's located in 22 states.

As of December 31, 2000, the bank had total assets of \$62 million, total deposits of \$53 million, net Tier 1 Capital of \$5.4 million, and net income for the year of \$317 thousand. Throughout the evaluation period, the bank's earnings were significantly below peer group averages, which can negatively impact its capacity to perform under the Investment Test. WFOH offers a full range of credit, deposit, and investment products.

Through its affiliation with WFC, its customers can access some services not normally available from a small, rural bank. WFOH specializes in agricultural lending, which is consistent with the economic focus of its market. Gross loans are \$35 million; commercial loans for agricultural purposes and real estate loans secured by farmland together constitute about 25% of the loan portfolio. The bank also makes a significant volume of residential real estate loans, which comprise about 30% of the loan portfolio. Due to its rural location, WFOH is not a HMDA reporter. See the Service Test for a more complete description of the products and services offered by the bank.

All of the bank's facilities are located in one assessment area. The assessment area is a non-MSA area comprised of Van Wert County in northwestern Ohio. The main office has convenient lobby hours on weekdays, drive-up service on Saturdays, and two full service ATMs in operation 24 hours daily.

Except for low earnings, there are no other financial or legal factors impeding the ability of the bank to meet the service, investment, and credit needs of its assessment area. During the evaluation period, the bank was affected by the merger between Norwest Corporation and Wells Fargo & Company, mainly by the change of name. The merger did not have a significant impact upon the bank's fundamental strategy for helping serve the needs of the community.

There were seven affiliated bank and non-bank entities that contributed to WFOH's CRA performance. Refer to Appendix A for identification of the entities and the activities they contributed.

The bank was rated Satisfactory at the previous evaluation dated February 9, 1996.

## Scope of the Evaluation

### Evaluation Period/Products Evaluated

This evaluation assesses the performance of the bank and affiliated entities in the Van Wert County assessment area from February 10, 1996, through May 7, 2001. Home mortgage from January 1, 1996, through December 31, 2000, and small business, and small farm lending activity from January 1, 1997, through December 31, 2000, were evaluated. Small business and small farm data from 1996 was not available for analysis. Although the bank is not a HMDA reporter, management gathered and submitted HMDA loan information for our consideration in this evaluation. Also, we considered Community Development, Investment, and Service information from February 10, 1996, through May 7, 2001. Home-purchase, home-improvement, refinanced, and community development loans were reviewed in conjunction with the Lending Test. Additionally, any special loan programs offered by the bank were included in our analysis, as appropriate. The Investment Test focused on the review of qualifying investments, grants, and donations. Community development services, retail banking locations, and retail banking services were reviewed in connection with the Service Test. For more information about the scope of this evaluation please refer to Appendix A.

### Data Integrity

We performed a separate data integrity examination of the bank's loan reporting process. At that examination, the bank's small business and small farm loan data submitted in compliance with requirements of the CRA and utilized for this performance evaluation was reviewed for accuracy using a random sample. The review revealed no significant errors in reporting. The accuracy of HMDA loan data was reviewed utilizing reports and working papers of the internal auditors, as well as a sample of loan files. The HMDA, small business and small farm loan data were determined to be accurate and useful for this CRA performance analysis.

The accuracy of the bank's community development loans, investments, services, and other community development information was verified during this CRA examination. No significant errors were found in this information. Only those activities that qualified under the CRA regulation's definition of community development were considered in this evaluation.

### Selection of Areas for Full-Scope Review

WFOH operates in only one assessment area. Therefore, that area was selected for a full-scope review. The bank did not make any changes to its delineated assessment area during the evaluation period.

### Ratings

The bank's overall rating is based on its performance in its assessment area.



## Other

We performed four contacts during the examination in order to gather information about the community and its needs. We interviewed representatives of a nonprofit, a credit union, and two county government departments. The interviewees described needs for low interest rate loans, consumer installment loans, agricultural loans, small business loans, home mortgage loans, vehicle loans, and loans for education. One person contacted also stated the need for good, friendly customer service of the kind that is highly valued in a small town. And one noted needs for micro-enterprise loans, affordable housing loans, and loans that promote economic development.

We also reviewed information provided by the bank about needs for financial services in Van Wert County. WFOH had an active outreach program during the evaluation period in which bank employees contacted local government officials, businesses, nonprofits, and customers. From those contacts, the bank determined the following needs; financial education for young people, small loans to farms, credit counseling and credit seminars for adults, affordable housing, affordable mortgage loans, down payment assistance, retention of population through economic development, and financing of small businesses.

## Fair Lending Review

The OCC performed an analysis of 1999 Small Business and Small Farm lending data, public comments, and consumer complaint information in accordance with the OCC's risk-based fair lending approach. The analysis of this data revealed no basis for this office to conduct a comprehensive fair lending examination in connection with the CRA evaluation. Therefore, the OCC has not performed a full scope fair lending review of the bank. The latest comprehensive fair lending examination was performed in 1996.

### Conclusions:

- WFOH has adequate fair lending policies and procedures in place and periodically provides training to its employees to prevent discriminatory practices from occurring.
- Wells Fargo & Company has a satisfactory process in place, including training, to help ensure ongoing corporate-wide compliance with fair lending laws.

## Conclusions with Respect to Performance Tests

### LENDING TEST

There is an important contextual issue for evaluation of the bank's performance under the Lending Test. Because the bank is not a HMDA reporter, the market share data in Tables 2, 3, 4, 7, 8, and 9 was not included. Hence, in those tables, the market share data is not useful as a barometer of the bank's lending performance and not included in the tables. However, for the Lending Activity analysis below, we were able to adjust the 1999 HMDA loan market share data in order to estimate the bank's and affiliates' combined market share and rank.

### Conclusions for Areas Receiving Full-Scope Reviews

The bank's performance under the Lending Test is rated "Outstanding." Based on a full-scope review, the bank's overall lending performance in its Van Wert County assessment area is excellent. This conclusion is based upon an excellent level of lending activity, good concentration in the assessment area, excellent borrower distribution of loans, and an excellent amount of CD loans.

### LENDING ACTIVITY

*Refer to Table 1 in Appendix C for the facts and data used to evaluate the bank's lending activity.*

During this evaluation period, WFOH provided an excellent level of small farm, home mortgage, and small business financing that is commensurate with its size and condition. The primary indicator for this performance is the relationship between the bank's deposits market share and rank in its assessment area compared to its lending market share and rank.

On June 30, 1999, WFOH held a little over \$53 million of deposits which ranked it fourth in size among FDIC-insured financial institutions in Van Wert County. The bank held 15% of the insured deposits in the county.

For reportable small farm loan activity in 1999, WFOH ranked first with 102 loans and a 71.8% market share. For home mortgage loans, the bank ranked second with 134 loan originations which equals a 13.6% market share. And for reportable small business loans, the bank again ranked second with 26 loans and a 12.4% market share.

In its two most important CRA loan products, home mortgage and small farm, the bank's lending activity in 1999 was substantially close to or exceeded its deposit taking activity. And in the secondary loan product of small business loans, WFOH's lending activity was reasonably close to its deposit taking activity. This represents excellent responsiveness to area credit needs. This excellent lending activity performance had a positive effect upon our overall conclusion about the bank's performance under the Lending Test.

## **DISTRIBUTION OF LOANS BY INCOME LEVEL OF THE GEOGRAPHY**

*Refer to Tables 2, 3, 4, 5, and 6 in Appendix C for the facts and data used to evaluate the borrower distribution of the bank's home mortgage loan originations and purchases.*

### *Home Mortgage Loans, Small Loans to Businesses, and Small Loans to Farms*

WFOH's assessment area contains only middle-income geographies. Therefore, an analysis of the bank's lending activity by income level of geography would not yield meaningful results. Our conclusion about the geographic distribution of the bank's lending activity is predicated upon WFOH's performance in the Lending Gap Analysis and Inside/Outside Ratio. These indicate the geographic distribution of the bank's lending activity is good.

### ***Lending Gap Analysis***

We did not note any conspicuous gaps in the bank's lending activity. During the evaluation period, the bank penetrated all of the geographies in its assessment area with one or more home mortgage loan products. WFOH achieved a similar level of penetration with its small loans to businesses and farms. The one census tract where the bank did not make a reportable small farm loan contained only two farms. Thus, our lending gap analysis had a positive effect on our conclusions about the geographic distribution of the bank's lending activity.

### ***Inside/Outside Ratio***

WFOH's lending activity reflects a good concentration in its assessment area. Almost 85% of the home mortgage loans, 78% of small farm loans, and 75% of small business loans originated by the bank during the evaluation period were made to borrowers in its assessment area. The bank's good lending focus on its assessment area had a positive effect on our conclusions about the geographic distribution of its lending activity.

## **DISTRIBUTION OF LOANS BY INCOME LEVEL OF THE BORROWER**

### *Home Mortgage Loans*

*Refer to Tables 7, 8, and 9 in Appendix C for the facts and data used to evaluate the borrower distribution of the bank's home mortgage loan originations and purchases.*

The overall distribution of home mortgage loans by income level of borrower is considered excellent. The distribution is excellent for home purchase loans, home improvement loans, and home mortgage refinance loans. This had a positive effect on our conclusions about the bank's performance under the Lending Test.

WFOH's distribution of home purchase and home mortgage refinance loans by borrower income level was adequate for low- income borrowers and excellent for moderate- income borrowers. The proportion of bank loans made to low- income borrowers was reasonably close to the proportion of low-income families in the assessment area, in view of the mitigating factors discussed below. The proportion of bank loans made to moderate-income borrowers

exceeds the demographic. The bank's performance in these types of loans is partly attributable to the flexible loan programs discussed below.

For home improvement loans, WFOH's pattern of lending to low-income borrowers was substantially close to the distribution of low-income families, in view of the mitigating factors discussed below. This is indicative of good performance. The bank's lending to moderate-income borrowers is even stronger because it substantially exceeds the demographic for moderate-income families.

A factor we considered in the borrower distribution of the bank's lending activity is the rising unemployment rate in manufacturing sector that supports a large segment of the county's population combined with the county's poverty level. See the Market Profile in Appendix B for details. Many low-income families cannot qualify for home purchase loans, don't own homes, or do not have a need for home mortgage refinance or home improvement loans. Further, the pool of possible low-income applicants for HMDA loans is significantly reduced by the 8.46% poverty level in Van Wert County. These demographic issues affect the bank's distribution for home mortgage loan products.

Market share statistics are not a meaningful indicator of the bank's performance in borrower distribution because the bank is not a HMDA reporter. Accordingly, market share data is not reflected in the associated tables.

#### *Small Loans to Businesses*

The distribution of loans by income level of business is considered excellent. This conclusion is supported by the bank's high percentage of loans to small businesses, excellent record of making small loans to businesses, and its excellent market share of loans to small businesses. The bank's performance in this type of loan is partly attributable to the flexible loan programs discussed below.

WFOH's proportion of loans to businesses that have annual revenues of less than \$1 million is almost equal to the percentage of businesses in the assessment area that earn annual revenues of less than \$1 million. The bank's performance is substantially close to the demographic; coming within two loans over the four-year evaluation period of matching the AA's demographic. This performance is indicative of an excellent record of meeting the credit needs of small businesses.

While the size of the reported small business loans made by WFOH is a less reliable indicator, the bank's performance in this standard is nevertheless excellent. A very high percentage of the bank's reported small business loans were in amounts of \$100 thousand or less. An additional percentage of loans were in the greater than \$100 thousand to \$250 thousand size category. As a result, 95% of the bank's small business loans were in amounts of \$250 thousand or less. This characteristic of the bank's lending performance shows an excellent focus on making small loans to businesses.

WFOH's market share of reportable loans to small businesses is also excellent. The bank's market share of loans made to businesses with revenues of \$1 million or less exceeds its overall market share of all small loans made to businesses, indicating an excellent record of meeting the credit needs of small businesses.

### *Small Loans to Farms*

WFOH's distribution of loans by income level of farms is considered excellent. This conclusion is supported by the bank's high percentage of loans to small farms, excellent record of making small loans to farms and its excellent market share of loans to small farms. Some of the bank's success in serving the need for small loans to farms is attributable to its participation in a State of Ohio agricultural loan program described below under Product Innovation and Flexibility.

WFOH's proportion of reportable loans to farms that have annual revenues of less than \$1 million is equal to the percentage of farms in the assessment area that earn annual revenues of less than \$1 million. The bank's performance is equal to the demographic, indicative of an excellent record of meeting the credit needs of small farms.

While the size of the bank's reported small farm loans is a less reliable performance indicator, its performance in this standard is excellent. A substantial percentage of the WFOH's reported small farm loans were in amounts of \$100 thousand or less. The remainder of the bank's loans fall in the greater than \$100 thousand to \$250 thousand category, such that 100% of these kinds of loans were in amounts of \$250 thousand or less. This feature of the bank's lending performance is excellent.

WFOH's market share of loans to small farms is also excellent. The bank's market share of loans made to farms with revenues of \$1 million or less exceeds its overall market share of all small loans made to farms, indicating an excellent focus on meeting the credit needs of smaller farms.

### **Community Development Lending**

*Refer to Table 1 in Appendix C for the facts and data used to evaluate the bank's level of community development lending.*

WFOH made an excellent amount of CD loans during the evaluation period. The bank's total CD loans equal 12.5% of net Tier 1 capital, indicating a significant commitment of funds to meet community needs. This had a positive effect upon our conclusions about the bank's performance under the Lending Test. The loans were made to three different nonprofit organizations and provided funds for working capital, equipment acquisition, and facilities modernization. The organizations serve community development needs of LMI persons in the assessment area. None of the loans were complex.

WFOH's largest community development loans (three totaling \$500 thousand) were made to a foundation that operates a home and school that targets low- and moderate-income children. The facility provides resident services to troubled youths with behavior problems. The services include emergency respite, specialized foster care, training for independent living, and long-term foster care.

The recipient of the bank's second largest amount of community development loan funds (four

loans totaling \$152 thousand) is a community based mental health center that diagnoses, treats, and prevents mental illness. The center serves low- and moderate-income patients. It offers a day treatment program, medical psychiatric services, case management, emergency services, psychological evaluations, and a domestic violence program. It receives most of its funding from Medicaid, Medicare, and other government agency sources. Over 50% of the center's income is generated from government grants.

The bank made a small loan to another nonprofit organization to finance the purchase of a handicap accessible van. This organization provides in-home personal care and nursing services for elderly, ill, or disabled persons. The organization is also the contract provider for, and administers, the county's Women, Infants, and Children Supplemental Food Program. A majority of the persons served by this organization either are on fixed incomes, or are from low- and moderate-income families.

### **Product Innovation and Flexibility**

WFOH uses flexible loan programs to help address the credit needs of low- and moderate-income borrowers. Some of these programs are available to all customers of banks owned by WFC and some are specific to this bank. The programs and lending activity in each are listed below:

- The *Easy to Own Program* expands Wells Fargo's normal home mortgage loan underwriting criteria to require only a 3% down payment, to allow a 97% loan-to-value, to allow gifts or grants to cover closing costs, and to permit higher debt service ratios. This program targets LMI homebuyers with minimal cash reserves and who cannot meet market standards for debt service ratios. WFOH made two loans totaling \$99,910 in this program, which were included in the bank's home mortgage loan data.
- The *Down Payment Assistance Program* (DAP) is used in conjunction with a FHA first mortgage loan program. The DAP program expands Wells Fargo's normal loan underwriting criteria to allow a loan for a down payment. Other favorable features of the program allow up to a 3% gift of funds for the down payment, and there are no income limits and no specific term. This program targets borrowers in need of gifted funds and down payment and closing cost assistance in order to obtain a home mortgage loan. WFOH made one loan for \$1,347 in this program. This kind of loan is not included in the bank's home mortgage loan data.
- The *4-H Club, FFA Chapter, Commercial Steer Loan Program* is used to help introduce the community's LMI youth to the concepts of financial management in agribusiness. The program adjusts the bank's normal loan underwriting criteria by offering lower interest rates and fees (the application fee is waived, as is the UCC filing fee in most cases). The loans are made to children who have not yet graduated from high school to fund their agricultural club projects - specifically purchasing and raising an animal for market. While the parents do co-sign to mitigate the risk, these loans are made to persons who are high school students or younger, and who do not have significant incomes. WFOH made 11 loans totaling \$26,500 in this program.

- The *Agri-Link Deposit Program* is a state program in which the bank voluntarily participates. It provides below market rate loans to eligible farmers, including those hurt by natural disasters. The purpose of the program is to support agribusiness by offsetting the high cost of borrowing operating funds. It also assists farmers who have been adversely impacted by drought conditions or other disaster situations. The State of Ohio places low rate time deposits in participating banks that are then used to fund low rate (400 basis points below the prime lending rate) operating loans to farmers. The maximum loan amount is \$100 thousand per applicant. The applicant must show a need for a reduced rate. WFOH made 115 loans totaling \$6.1 million in this program. All of these were reportable as small loans to farms.



## INVESTMENT TEST

### Conclusion for Area Receiving Full-Scope Review

*Refer to Table 12 in Appendix C for the facts and data used to evaluate the bank's level of qualified investments.*

Two important contextual issues for the Investment Test are the low amount of opportunities in the assessment area and the bank's low earnings. The small population of Van Wert County, its rural nature, the lack of population growth, and the limited number of private nonprofit organizations in the area reflect limited investment opportunities in the area. Also, the bank's below average earnings has some impact on its capacity to make grants and donations.

Within the above context, WFOH's performance under the Investment Test is "Outstanding." This conclusion is based primarily upon the bank's high dollar amount and number of investments, grants, and donations when compared to its size, earnings, and capital. Other factors influencing this rating are the community needs met by the investments and the positive impact of the investments on the community.

The bank's investment activity displays very good responsiveness to community development and credit needs. Within the context of the factors discussed above, the bank made a high dollar amount of qualifying investments during the evaluation period. To assist in gauging the relative volume of investments, we calculated their relationship to Tier 1 capital. The bank's community development investment activity accounts for 9.7% of the bank's Tier 1 Capital over the evaluation period. This represents a significant allocation of resources to help meet the community development needs of the assessment area.

The bank's largest investment is a \$500 thousand participation in a \$5 million HUD Bond purchased by an affiliate of WFOH. The bond financed Community Development Block Grants made in 1999, some of which benefited an area designated as the Greater Fort Wayne [Indiana] MSA Regional Area. This regional area includes the adjacent Van Wert County, which is the bank's assessment area. The securities that supported the Ohio AA was allocated to WFOH for CRA consideration. The allocated portion was not considered in any other affiliate's CRA performance.

In addition to the investment, WFOH made a significant number of donations that benefited fifteen different groups or projects. These recipients of bank funds provide benefits to Van Wert City or County in the areas of affordable housing, community services, education, housing and counseling for troubled children, health care, emergency assistance, assistance for the elderly, shelter and counseling for battered women and children, and others. Specifically, three grants benefited either Van Wert County or the City of Van Wert and were allocated as follows: One grant for economic development, and two grants to help finance construction of affordable housing. The economic development funds helped finance acquisition of land, construction of buildings, or expansion of existing facilities, that benefited existing businesses or assisted new businesses. At least 24 new jobs were created for LMI individuals and other jobs were retained as a result of this funding. These are important community development needs.

Generally, the bank did not take a leadership role in its investments, grants, and donations. And none of them are innovative or complex. Nevertheless, the high level and the attempt to help meet a variety of important community needs indicate excellent performance in the Investment Test.

## SERVICE TEST

### Conclusion for Area Receiving Full-Scope Review

The bank's performance under the Service Test is rated "High Satisfactory." This conclusion is based primarily upon WFOH's excellent level of community development services targeted at important needs.

### Retail Banking Services

*Refer to Table 13 in Appendix C for the facts and data used to evaluate the distribution of the bank's branch delivery system and branch openings and closings.*

An important contextual issue is the geographic size of Van Wert County and the location of the City of Van Wert in the county. The county is roughly rectangular in shape and is about 23 miles wide and 16 miles long. The City of Van Wert, where the bank's staffed office and two ATMs are located, occupies a geographically central location in the county. This central location and the good network of highways and roads in the county make any banking facility in the City of Van Wert accessible to all parts of the county. However, the distances involved could be a deterrent to low-income residents who don't own a vehicle nor have access to the kinds of convenient public transportation that exists in urban settings. Therefore, the distribution of WFOH's facilities is considered adequate.

WFOH closed two branches during this evaluation period. Both of them were located in the City of Van Wert. One of the closed branches was limited service, with only a walk-up window and a drive-up window. Given the small size of the city and the number of financial institutions operating therein (see the community profile in Appendix B), these closures had only a minimal adverse impact on the accessibility of the bank's facilities to all segments of its delineated community. The bank also relocated its main office. In doing this, WFOH moved to a larger, more modern facility with improved parking and easier access. This facility enhanced the bank's ability to deliver products and services, including drive-up banking and drive-up ATM benefits that were not available at the old location. After consideration of these factors, WFOH's record of opening and closing branches is considered adequate.

WFOH's traditional product delivery systems are augmented by ATMs, 24-hour telephone banking, and Internet banking. The bank has two proprietary ATMs, open 24 hours a day at its main office and a former branch site. The ATMs are full service. Customers can view account information, open new accounts, set up direct deposits, transfer funds between accounts, order checks, pay bills, and apply for home equity loans and credit cards through Wells Fargo Internet Banking. However, there is no data available to show that these alternative delivery systems increase the accessibility of WFOH's services to LMI persons. Therefore these services did not carry significant weight in the assessment of the bank's performance. WFOH's hours of operation are adequate.

WFOH serves as a local outlet for the extensive menu of Wells Fargo products and services. Any financial product or service not directly offered by WFOH can easily be accessed from one of its many affiliates through the bank. The bank and/or affiliates offer numerous real estate, consumer, credit card, agricultural, commercial, economic development, and community

development loan products. These include several flexible loan products targeted toward LMI applicants, small businesses, and small farms, some of which are discussed under the Lending Test. A wide variety of consumer and business deposit accounts are offered. WFOH offers a checking account product that requires no minimum balance after the initial deposit of \$50 and charges no fees other than the cost of checks, though the first order of checks is also free. This allows customers, including LMI persons, to maintain accounts without substantial fees.

## **Community Development Services**

WFOH provided an excellent level of community development services that are responsive to the needs of the community. Eight (8) different bank employees provided community development services to eleven nonprofit organizations. These organizations provide community services targeted primarily at LMI persons, promote economic development, support small businesses and farms, and provide affordable housing.

An officer of the bank served on the Board of Directors and on the Family Selection Committee of a nonprofit organization that provides affordable housing to LMI persons. She provided technical assistance to the selection process for a candidate to receive a Habitat for Humanity home. This organization has identified affordable housing as a critical component in building individual stability and independence, and helping people move up the economic ladder to gain greater accessibility to financial services.

Officers of the bank served as Directors on the Boards of three other nonprofit organizations. Through these activities, they gave technical assistance to organizations that provide community services in the areas of food, education, counseling, and health care targeted primarily at LMI persons. These services help stabilize or improve the lives of LMI persons, thus enhancing their ability to obtain or hold jobs and be in a position to gain access to services offered by financial institutions.

Other officers of the bank served in various executive functions in professional organizations that promote small farms, small businesses, and economic development in Van Wert County. These WFOH employees lent their banking and financial expertise to the nonprofit organizations in their planning, fund raising, marketing, educational, program administration, and other activities. The objectives of these organizations are to stop the decline in the population, the decrease in the number of small farms, and the erosion in the number of small businesses in Van Wert. They work to achieve these objectives by engaging in activities that promote economic development, attract and support small businesses, and maintain small farms, thereby creating jobs and economic opportunities that will stabilize declining social-economic trends. This includes efforts to ensure the availability of financial services to support these activities.

Officers of the bank also serve on the Housing Advisory Committee of a County Planning Commission. They give technical support to a committee that works to identify housing needs, primarily for LMI residents, and formulate strategies to meet those needs. This planning process includes identifying funding sources and other financial services issues that impact the availability of affordable housing.

During the evaluation period the number of full time equivalent bank employees ranged between 16 and 22. By having a high percentage of its employees engaged in CD services, WFOH demonstrated excellent commitment toward fulfilling the community's need for such services.

## 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 assessment area that received a comprehensive examination review (designated by the term “Full-Scope”) and any that received a less comprehensive review (designated by the term “Limited-Scope”).

<b>Time Period Reviewed</b>	Lending Test : 01/01/96 to 12/31/00 Community Development Lending: 02/10/96 to 05/07/01 Investment Test: 02/10/96 to 05/07/01 Service Tests : 02/10/96 to 05/07/01	
<b>Financial Institution</b>		<b>Products Reviewed</b>
Wells Fargo Bank Ohio (WFOH) Van Wert, Ohio		HMDA, Small Business, and Small Farm Loans; Special Loan Programs; and CD Loans.
<b>Affiliate(s)</b>	<b>Affiliate Relationship</b>	<b>Products Reviewed</b>
Wells Fargo Home Mortgage	Holding Company Subsidiary	Home purchase and refinance loans
Norwest Home Improvement	Holding Company Subsidiary	Home improvement loans
Wells Fargo Bank West	Holding Company Subsidiary	Home improvement loans
Wells Fargo Bank, NA	Holding Company Subsidiary	Small Farm and Small Business Loans
Wells Fargo Housing Foundation	Nonprofit established by Wells Fargo Home Mortgage	Donations
Wells Fargo Bank Indiana, NA	Holding Company Subsidiary	Home purchase and refinance, Small Farm, and Small Business Loans
Wells Fargo Bank Wisconsin, NA	Holding Company Subsidiary	Small Business Loans
<b>List of Assessment Areas and Type of Examination</b>		
<b>Assessment Area</b>	<b>Type of Exam</b>	<b>Other Information</b>
Van Wert County #161	Full-Scope	NA

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

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#### Market Profiles for Areas Receiving Full-Scope Reviews

Van Wert County #161.....	B - 2
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**Van Wert County #161**

Demographic Information for Full-Scope Area: Van Wert County						
Demographic Characteristics	#	Low % of #	Moderate % of #	Middle % of #	Upper % of #	NA* % of #
Geographies (Census Tracts/BNAs)	9	0	0	100	0	0
Population by Geography	30,464	0	0	100	0	0
Owner-Occupied Housing by Geography	9,077	0	0	100	0	0
Businesses by Geography	1,001	0	0	100	0	0
Farms by Geography	376	0	0	100	0	0
Family Distribution by Income Level	8,588	12	18	29	41	0
Distribution of Low- and Moderate-Income Families throughout AA Geographies	2,573	0	0	100	0	0
Median Family Income HUD Adjusted Median Family Income for 2000 Households Below the Poverty Level	= \$30,562 = \$45,300 = 8.46%	Median Housing Value Unemployment Rate 2Q2001				= \$46,747 = 5.2%

(\*) The NA category consists of geographies that have not been assigned an income classification.  
 Source: 1990 U.S. Census, 2000 HUD updated MFI, Dun & Bradstreet Business Geo-demographic Data, and Local Economic Development Office.

The bank has defined its assessment area (AA) as all of Van Wert County in northwestern Ohio. The AA complies with regulatory guidelines and does not arbitrarily exclude any LMI geographies.

Van Wert County is in a rural part of Ohio and has experienced a population decline of about 2.6% since the 1990 U.S. Census. The population is not very diverse, and is comprised of 97% White persons, 2% Hispanic non-White persons, and 1% other minorities. Other key demographic characteristics of the county are that 31% of the households receive social security payments, 18% are in retirement, and a little over 10% are self employed farmers. Almost 15% of the population consist of persons over 65 years old. Only three cities in the county have populations over 1,000. Those are Van Wert with 10,608 persons; Delphos with 3,154; and Convoy with 1,165 according to 1998 estimates by the U.S. Census Bureau.

The City of Van Wert is the largest in the county, it is centrally located in the county, and it is the county seat. As such, the city serves as the economic and political hub of the county. A good network of highways and roads exists in the county, which make the city fairly easily accessed from most parts of the county.

The housing stock is fairly stable, with an annual average of 5 single-family housing permits issued in the three years ending 1999 and no multi-family permits issued in that period. According to the 1990 U.S. Census, the housing is predominately owner-occupied, with 76% of



the units falling into that category. The median average year build is 1949, indicative of older homes that may need updating. Almost 89% of the housing consisted of 1-4 family units. The vacancy rate for housing was 6%.

The decreasing population and stable housing stock indicate there is fairly low inherent demand for home purchase loans. Peer mortgage data for 1999 shows 53 lenders made a total of 353 home purchase loans. Market demand for home improvement and refinancing loans is also modest. The 1999 peer mortgage data shows that 29 lenders made 85 home improvement loans and 83 lenders made 502 refinancing loans. These statistics indicate that the home mortgage loan market is highly competitive.

Until recently, the economy of Van Wert County was fairly healthy and diversified. Agriculture plays an important role. Year 2000 demographic information from Dun & Bradstreet shows there are 376 farms operating in the county. One local concern is the falling number of small farms in the county. Though agriculture employs only a small part of the workforce, that activity contributes almost \$90 million of cash receipts to the economy. The county ranks second in the state in soybean production, and corn is another important crop. The 1999 peer small farm loan data shows that 6 lenders made 142 loans.

Manufacturing is also an important sector of the local economy. This activity is centered in industrial and automotive manufacturing, and employs 41% of the working population in the county. This sector of the economy has been adversely impacted by the slowdown in new automobile sales. Local automobile parts manufacturers have laid off significant numbers of workers, causing the unemployment rate to rise. Trade and services are important sectors, employing 21% and 18% of the workforce, respectively.

The financial services sector is competitive. Locally, WFOH competes with two commercial banks, two savings and loans, a branch of an Indiana credit union, a finance company, and an agricultural credit corporation. As of June 30, 2000, five FDIC-insured institutions held a total of \$362 million in deposits, with WFOH ranking fourth. Some of WFOH's competitors have multiple branches in Van Wert County: Community First Bank & Trust has branches in Delphos, Ohio City, Van Wert, and Willshire and Firststar has branches in Convoy, Delphos, and Van Wert. A number of nonbank lenders are active in the market, including mortgage companies and credit card lenders.

There are only a few private nonprofit organizations meeting community development needs in Van Wert County. There is only one affordable housing provider, Habitat for Humanity. Various government agencies have rural housing, affordable housing, rural development, and economic development programs that are accessible to residents of the assessment area. But the limited public information available indicates little local utilization of these programs, perhaps due to a lack of knowledge about them. Religious organizations and charities also work to meet some community development needs. But, available information suggests there is limited opportunity for financial institutions to engage in community development activities.

The Van Wert County Economic Development Office lists as its goals to assist local businesses in finding new markets, help startup or relocating businesses get established in the county, and promote the county to develop a tourism base. The Office would like to have local financial institutions partner with them in these efforts.

## Appendix C: Tables of Performance Data

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### Content of Standardized 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: purchased loans are treated as originations/purchases; market rank is based on the number of loans originated and purchased by the bank as compared to all other lenders in the MSA/assessment area; and market share is the number of loans originated and purchased by the bank as a percentage of the aggregate number of reportable loans originated and purchased by all lenders in the MSA/assessment area. The following is a listing and brief description of the tables:

- Table 1. Lending Volume** - Presents the number and dollar amount of reportable loans originated and purchased by the bank over the evaluation period by MSA/assessment area.
- Table 2. Geographic Distribution of Home Purchase Loans** - Compares the percentage distribution of the number of loans originated and purchased by the bank in low-, moderate-, middle-, and upper-income geographies to the percentage distribution of owner-occupied housing units throughout those geographies. The table also presents market rank and market share information based on the most recent aggregate market data available.
- Table 3. Geographic Distribution of Home Improvement Loans** - See Table 2.
- Table 4. Geographic Distribution of Refinance Loans** - See Table 2.
- Table 5. Geographic Distribution of Small Loans to Businesses** - The percentage distribution of the number of small loans (less than or equal to \$1 million) to businesses originated and purchased by the bank in low-, moderate-, middle-, and upper-income geographies compared to the percentage distribution of businesses (regardless of revenue size) throughout those geographies. The table also presents market rank and market share information based on the most recent aggregate market data available.
- Table 6. Geographic Distribution of Small Loans to Farms** - The percentage distribution of the number of small loans (less than or equal to \$500,000) to farms originated and purchased by the bank in low-, moderate-, middle- and upper-income geographies compared to the percentage distribution of farms (regardless of revenue size) throughout those geographies. The table also presents market rank and market share information based on the most recent aggregate market data available.

- Table 7. Borrower Distribution of Home Purchase Loans** - Compares the percentage distribution of the number of loans originated and purchased by the bank to low-, moderate-, middle-, and upper-income borrowers to the percentage distribution of families by income level in each MSA/assessment area. The table also presents market rank and market share information based on the most recent aggregate market data available.
- Table 8. Borrower Distribution of Home Improvement Loans** - See Table 7.
- Table 9. Borrower Distribution of Refinance Loans** - See Table 7.
- Table 10. Borrower Distribution of Small Loans to Businesses** - Compares the percentage distribution of the number of small loans (less than or equal to \$1 million) originated and purchased by the bank to businesses with revenues of \$1 million or less to the percentage distribution of businesses with revenues of \$1 million or less. In addition, the table presents the percentage distribution of the number of loans originated and purchased by the bank by loan size, regardless of the revenue size of the business. Market share information is presented based on the most recent aggregate market data available.
- Table 11. Borrower Distribution of Small Loans to Farms** - Compares the percentage distribution of the number of small loans (less than or equal to \$500 thousand) originated and purchased by the bank to farms with revenues of \$1 million or less to the percentage distribution of farms with revenues of \$1 million or less. In addition, the table presents the percentage distribution of the number of loans originated and purchased by the bank by loan size, regardless of the revenue size of the farm. Market share information is presented based on the most recent aggregate market data available.
- Table 12. Qualified Investments** - Presents the number and dollar amount of qualified investments made by the bank in each MSA/AA. The table separately presents investments made during prior evaluation periods that are still outstanding and investments made during the current evaluation period. Prior period investments are reflected at their book value as of the end of the evaluation period. Current period investments are reflected at their original investment amount even if that amount is greater than the current book value of the investment. The table also presents the number and dollar amount of unfunded qualified investment commitments. In order to be included, an unfunded commitment must be legally binding and tracked and recorded by the bank's financial reporting system.
- Table 13. Distribution of Branch Delivery System and Branch Openings/Closings** - Compares the percentage distribution of the number of the bank's branches in low-, moderate-, middle-, and upper-income geographies to the percentage of the population within each geography in each MSA/AA. The table also presents data on branch openings and closings in each MSA/AA.

**Table 1. Lending Volume**

LENDING VOLUME												Evaluation Period: January 1, 1996 TO December 31, 2000	
MSA/Assessment Area	% of Rated Area Deposits in MSA/AA*	Home Mortgage		Small Loans to Businesses		Small Loans to Farms		Community Development**		Total Reported Loans		% of Rated Area Loans (#) in AA	
		#	\$ (000's)	#	\$ (000's)	#	\$ (000's)	#	\$ (000's)	#	\$ (000's)		
<b>Full-Scope:</b>													
Van Wert County	100	554	28,045	110	5,926	395	14,300	8	677	1,067	48,948	100	
<b>Limited-Scope:</b>													
NA													

\* Deposit Data as of June 30, 1999.

\*\* CD loans cover the period February 10, 1996 to May 7, 2001.

**Table 2. Geographic Distribution of Home Purchase Loans**

Geographic Distribution: HOME PURCHASE LOANS										Evaluation Period: January 1, 1996 TO December 31, 2000						
MSA/Assessment Area	Low Income Geographies		Moderate Income Geographies		Middle Income Geographies		Upper Income Geographies		Overall Market Rank*	Market Share by Geography*					Total Home Purchase Loans	
	% Owner Occ Units	% Bank Loans	% Owner Occ Units	% Bank Loans	% Owner Occ Units	% Bank Loans	% Owner Occ Units	% Bank Loans		Overall	Low	Mod	Mid	Upp	#	% of Total**
<b>Full-Scope:</b>																
Van Wert County	0	0	0	0	100	100	0	0	2	NA	NA	NA	NA	NA	183	100
<b>Limited-Scope:</b>																
NA																

\* Based on 1999 Aggregate HMDA Data only. Market rank is for all income categories combined. WFOH is not a HMDA reporter so its performance is not reflected in the market share numbers.

\*\* Home purchase loans originated and purchased in the MSA/AA as a percentage of all home purchase loans originated and purchased in the rated area.

**Table 3. Geographic Distribution of Home Improvement Loans**

Geographic Distribution: HOME IMPROVEMENT LOANS										Evaluation Period: January 1, 1996 TO December 31, 2000						
MSA/Assessment Area	Low Income Geographies		Moderate Income Geographies		Middle Income Geographies		Upper Income Geographies		Overall Market Rank*	Market Share by Geography*					Total Home Improvement Loans	
	% Owner Occ Units	% Bank Loans	% Owner Occ Units	% Bank Loans	% Owner Occ Units	% Bank Loans	% Owner Occ Units	% Bank Loans		Overall	Low	Mod	Mid	Upp	#	% of Total**
<b>Full-Scope:</b>																
Van Wert County	0	0	0	0	100	100	0	0	11	NA	NA	NA	NA	NA	92	100
<b>Limited-Scope:</b>																
NA																

\* Based on 1999 Aggregate HMDA Data only. Market rank is for all income categories combined. WFOH is not a HMDA reporter so its performance is not reflected in the market share numbers.  
 \*\* Home improvement loans originated and purchased in the MSA/AA as a percentage of all home improvement loans originated and purchased in the rated area.

**Table 4. Geographic Distribution of Home Mortgage Refinance Loans**

Geographic Distribution: HOME MORTGAGE REFINANCE LOANS										Evaluation Period: January 1, 1996 TO December 31, 2000						
MSA/Assessment Area	Low Income Geographies		Moderate Income Geographies		Middle Income Geographies		Upper Income Geographies		Overall Market Rank*	Market Share by Geography*					Total Home Mortgage Refinance Loans	
	% Owner Occ Units	% Bank Loans	% Owner Occ Units	% Bank Loans	% Owner Occ Units	% Bank Loans	% Owner Occ Units	% Bank Loans		Overall	Low	Mod	Mid	Upp	#	% of Total**
<b>Full-Scope:</b>																
Van Wert County	0	0	0	0	100	100	0	0	2	NA	NA	NA	NA	NA	279	100
<b>Limited-Scope:</b>																
NA																

\* Based on 1999 Aggregate HMDA Data only. Market rank is for all income categories combined. WFOH is not a HMDA reporter so its performance is not reflected in the market share numbers.

\*\* Home mortgage refinance loans originated and purchased in the MSA/AA as a percentage of all home mortgage refinance loans originated and purchased in the rated area.

**Table 5. Geographic Distribution of Small Loans to Businesses**

Geographic Distribution: SMALL LOANS TO BUSINESSES										Evaluation Period: January 1, 1997 TO December 31, 2000						
MSA/Assessment Area:	Low-Income Geographies		Moderate-Income Geographies		Middle-Income Geographies		Upper-Income Geographies		Overall Market Rank*	Market Share by Geography*					Total Small Business Loans	
	% of Businesses	% BANK Loans	% of Businesses	% BANK Loans	% of Businesses	% BANK Loans	% of Businesses	% BANK Loans		Overall	Low	Mod	Mid	Upp	#	% of Total*
<b>Full-Scope:</b>																
Van Wert County	0	0	0	0	100	100	0	0	2	12.4	0.0	0.0	12.4	0.0	110	100
<b>Limited-Scope:</b>																
NA																

\* Based on 2000 Aggregate Small Business Data only. Market rank is for all income categories combined.

\*\* Small loans to businesses originated and purchased in the MSA/AA as a percentage of all small loans to businesses originated and purchased in the rated area.



**Table 6. Geographic Distribution of Small Loans to Farms**

Geographic Distribution: SMALL LOANS TO FARMS										Evaluation Period: January 1, 1997 TO December 31, 2000						
MSA/Assessment Area:	Low-Income Geographies		Moderate-Income Geographies		Middle-Income Geographies		Upper-Income Geographies		Overall Market Rank*	Market Share by Geography*					Total Small Farm Loans	
	% of Farms	% BANK Loans	% of Farms	% BANK Loans	% of Farms	% BANK Loans	% of Farms	% BANK Loans		Overall	Low	Mod	Mid	Upp	#	% of Total*
<b>Full-Scope:</b>																
Van Wert County	0	0	0	0	100	100	0	0	1	71.8	0.0	0.0	71.8	0.0	395	100
<b>Limited-Scope:</b>																
NA																

\* Based on 2000 Aggregate Small Farm Data only. Market rank is for all income categories combined.

\*\* Small loans to farms originated and purchased in the MSA/AA as a percentage of all small loans to businesses originated and purchased in the rated area.

**Table 7. Borrower Distribution of Home Purchase Loans**

Borrower Distribution: HOME PURCHASE LOANS										Evaluation Period: January 1, 1996 TO December 31, 2000						
MSA/Assessment Area	Low Income Borrowers		Moderate Income Borrowers		Middle Income Borrowers		Upper Income Borrowers		Overall Market Rank*	Market Share by Borrower Income*					Total Home Purchase Loans	
	% of Families	% Bank Loans**	% of Families	% Bank Loans**	% of Families	% Bank Loans**	% of Families	% Bank Loans**		Overall	Low	Mod	Mid	Upp	#	% of Total***
<b>Full-Scope:</b>																
Van Wert County	12	7	18	37	29	31	41	25	2	NA	NA	NA	NA	NA	183	100
<b>Limited-Scope:</b>																
NA																

\* Based on 1999 Aggregate HMDA Data only. Market rank is for all income categories combined. WFOH is not a HMDA reporter so its performance is not reflected in the market share numbers.

\*\* As a percentage of loans with borrower income information available. No income information was available for 1% of the loans made by WFOH.

\*\*\* Home purchase loans originated and purchased in the MSA/AA as a percentage of all home purchase loans originated and purchased in the rated area.

**Table 8. Borrower Distribution of Home Improvement Loans**

Borrower Distribution: HOME IMPROVEMENT LOANS										Evaluation Period: January 1, 1996 TO December 31, 2000						
MSA/Assessment Area	Low Income Borrowers		Moderate Income Borrowers		Middle Income Borrowers		Upper Income Borrowers		Overall Market Rank*	Market Share By Borrower Income*					Total Home Improvement Loans	
	% of Families	% Bank Loans**	% of Families	% Bank Loans**	% of Families	% Bank Loans**	% of Families	% Bank Loans**		Overall	Low	Mod	Mid	Upp	#	% of Total***
<b>Full-Scope:</b>																
Van Wert County	12	9	18	32	29	39	41	19	11	NA	NA	NA	NA	NA	92	100
<b>Limited-Scope:</b>																
NA																

\* Based on 1999 Aggregate HMDA Data only. Market rank is for all income categories combined. WFOH is not a HMDA reporter so its performance is not reflected in the market share numbers.

\*\* As a percentage of loans with borrower income information available. No income information was available for 0% of loans originated by WFOH.

\*\*\* Home improvement loans originated and purchased in the MSA/AA as a percentage of all home improvement loans originated and purchased in the rated area.

**Table 9. Borrower Distribution of Home Mortgage Refinance Loans**

Borrower Distribution: HOME MORTGAGE REFINANCE LOANS										Evaluation Period: January 1, 1996 TO December 31, 2000						
MSA/Assessment Area	Low Income Borrowers		Moderate Income Borrowers		Middle Income Borrowers		Upper Income Borrowers		Overall Market Rank*	Market Share by Borrower Income*					Total Home Mortgage Refinance Loans	
	% of Families	% Bank Loans**	% of Families	% Bank Loans**	% of Families	% Bank Loans**	% of Families	% Bank Loans**		Overall	Low	Mod	Mid	Upp	#	% of Total***
<b>Full-Scope:</b>																
Van Wert County	12	6	18	19	29	31	41	44	2	NA	NA	NA	NA	NA	279	100
<b>Limited-Scope:</b>																
NA																

\* Based on 1999 Aggregate HMDA Data only. Market rank is for all income categories combined. WFOH is not a HMDA reporter so its performance is not reflected in the market share numbers.

\*\* As a percentage of loans with borrower income information available. No information was available for 6% of loans originated by WFOH.

\*\*\* Home mortgage refinance loans originated and purchased in the MSA/AA as a percentage of all home mortgage refinance loans originated and purchased in the rated area.

**Table 10. Borrower Distribution of Small Loans to Businesses**

Borrower Distribution: SMALL LOANS TO BUSINESSES			Evaluation Period: January 1, 1997 TO December 31, 2000						
MSA/Assessment Area:	Businesses with Revenues of \$1 million or less		Loans by Original Amount Regardless of Business Size			Market Share**		Total Small Loans To Businesses	
	% of Businesses*	% BANK Loans	\$100,000 or Less	>\$100,000 to \$250,000	>\$250,000 to \$1,000,000	All	Rev \$1 million or less	#	% of Total***
<b>Full-Scope:</b>									
Van Wert County	89.61	88.07	86	9	5	12.44	12.88	110	100
<b>Limited-Scope:</b>									
NA									

\* Businesses with revenues of \$1 million or less as a percentage of all businesses.

\*\* Based on 2000 Aggregate Small Business Data only.

\*\*\* Small loans to businesses originated and purchased in the MSA/AA as a percentage of all small loans to businesses originated and purchased in the rated area.

**Table 11. Borrower Distribution of Small Loans to Farms**

Borrower Distribution: SMALL LOANS TO FARMS		Evaluation Period: January 1, 1997 TO December 31, 2000							
MSA/Assessment Area:	Farms with Revenues of \$1 million or less		Loans by Original Amount Regardless of Farm Size			Market Share***		Total Small Farm Loans	
	% of Farms*	% BANK Loans**	\$100,000 or Less	>\$100,000 to \$250,000	>\$250,000 to \$500,000	All	Rev \$1 million or less	#	% of Total****
<b>Full-Scope:</b>									
Van Wert County	99	99	95	5	0	71.83	71.94	395	100
<b>Limited-Scope:</b>									
NA									

\* Farms with revenues of \$1 million or less as a percentage of all farms.

\*\* Based on 2000 Aggregate Small Farm Data only.

\*\*\* Small loans to farms originated and purchased in the MSA/AA as a percentage of all small loans to farms originated and purchased in the rated area.

**Table 12. Qualified Investments**

QUALIFIED INVESTMENTS		Evaluation Period: February 9, 1996 TO May 7, 2001							
MSA/Assessment Area	Prior Period Investments*		Current Period Investments		Total Investments			Unfunded Commitments**	
	#	\$(000's)	#	\$(000's)	#	\$(000's)	% of Total	#	\$(000's)
<b>Full-Scope:</b>									
Van Wert County	0	0	30	524	30	524	100	0	0
<b>Limited-Scope:</b>									
NA									

\* 'Prior Period Investments' means investments made in a previous evaluation period that remains outstanding.

\*\* "Unfunded Commitments" means legally binding commitments reported on Report of Condition Schedule L-"Off-Balance Sheet Items".

**Table 13. Distribution of Branch Delivery System and Branch Openings/Closings**

DISTRIBUTION OF BRANCH DELIVERY SYSTEM AND BRANCH OPENINGS/CLOSINGS														Evaluation Period: February 9, 1996 TO May 7, 2001			
MSA/Assessment Area	Deposits	Branches						Branch Openings/Closings						Population			
	% of Rated Area Deposits in AA	# of Bank Branches	% of Rated Area Branches in AA	Location of Branches by Income of Geographies (%)				# of Branch Closings	# of Branch Openings	Net change in Location of Branches (+ or -)				% of the Population with Each Geography*			
				Low	Mod	Mid	Upp			Low	Mod	Mid	Upp	Low	Mod	Mid	Upp
<b>Full-Scope:</b>																	
Van Wert County	100	1	100	0	0	1	0	2	0	0	0	2	0	0	0	100	0
<b>Limited-Scope:</b>																	
NA																	

\* The percentage of the population in the MSA/AA that resides in these geographies.