



LARGE BANK

Comptroller of the Currency
Administrator of National Banks

Washington, DC 20219

Public Disclosure

March 31, 2000

Community Reinvestment Act Performance Evaluation

Bank One West Virginia, NA
Charter Number: 3106

1000 Fifth Avenue
Huntington, West Virginia 25701

Office of the Comptroller of the Currency

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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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Overall CRA Rating

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

The following table indicates the performance level of **Bank One, West Virginia, NA** with respect to the Lending, Investment, and Service Tests:

Performance Levels	Bank One, West Virginia, NA Performance Tests		
	Lending Test*	Investment Test	Service Test
Outstanding			
High Satisfactory			X
Low Satisfactory	X	X	
Needs to Improve			
Substantial Noncompliance			

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

Lending Test

- An adequate volume of lending. The volumes of home mortgage loans and small loans to businesses were both adequate. A good volume of community development loans was noted with the level of community development lending in Huntington excellent, but only adequate in the non-metropolitan assessment areas.

- A good distribution of loans by income level of geography. The geographic distribution of lending is good in the non-metropolitan areas and excellent in Huntington. Excellent distributions of home mortgage loans were noted in both the non-metropolitan areas and Huntington. The geographic distribution of small loans to businesses is adequate with an adequate distribution in the non-metropolitan areas and a good distribution in Huntington.

- An adequate distribution of loans by income level of borrower. The distribution of home mortgage loans by income level of borrower is adequate in the non-metropolitan assessment areas and good in Huntington. We did not have the information to analyze the distribution of small loans to businesses by income level of borrower. This omission tempered the performance in home mortgage lending and resulted in the overall conclusion stated above.

- A good performance in community development lending. The volume of lending was good and it was responsive to identified needs.

Investment Test

- An adequate volume of qualified investments. The opportunity for investments is relatively limited in both areas reviewed in a full scope analysis, but do exist. We noted that there is a significant volume of investments in the non-metropolitan assessment areas not reflected on the bank's books under Generally Accepted Accounting Principles. These investments have no book value, but a large portion of the investments continue to provide benefit to the bank's assessment areas by recycling money through loan funds. The existence of these investments is a significant performance context issue.
- Adequate responsiveness to the credit and community development needs of the Huntington and non-metropolitan assessment areas. In Huntington, the bank's investments respond to the affordable housing needs of the community. In the non-metropolitan assessment areas the bank's investments respond to the need for services to low- and moderate-income individuals.
- Adequate complexity and innovation in the investments in both full scope assessment areas. In Huntington, one prior period investment was moderately complex.

Service Test

- Good access to the bank's retail services. The distribution of branches reflects the distribution of the assessment areas' population, and there are no unreasonable gaps in the bank's branch network.
- The bank's hours of operation are consistent across different income levels of geographies.
- The bank's branch closings did not adversely affect the bank's low- and moderate-income areas.
- Good levels of community development services.

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 **Bank One, West Virginia, NA** prepared by the **Office of the Comptroller of the Currency (OCC)**, the institution's supervisory agency, as of **March 31, 2000**. 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) dwellings 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 at least 80% and less than 120% of the MFI.

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

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

Small Loans to Farms - 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.

Description of Institution

Bank One, West Virginia, N.A., (BOWV), headquartered in Huntington, West Virginia, is a wholly owned subsidiary of Bank One Corporation (BOC), which is headquartered in Chicago, Illinois. As of December 31, 1999, BOC had total assets of \$269 billion, making it the fifth largest bank holding company in the United States. BOC provides a full range of consumer and commercial financial products and services and operates banking offices in 15 states: Arizona, Colorado, Delaware, Florida, Illinois, Indiana, Kentucky, Louisiana, Michigan, Ohio, Oklahoma, Texas, Utah, West Virginia and Wisconsin. The Corporation operates more than 1,800 Banking Centers and an extensive network of automatic teller machines (ATM's) nation-wide. It has subsidiaries in 33 states and international offices on five continents.

BOWV is the fourth largest bank in West Virginia in terms of deposit market share. As of December 31, 1999, BOWV reported total assets of \$1.9 billion, total loans of \$1.3 billion, and a loan-to-deposit ratio of 84%. Tier 1 capital totals \$136.7 million. BOWV operates 26 banking centers and 37 ATM's throughout the State of West Virginia. As of December 31, 1999, BOWV's loan portfolio consisted of 14% commercial and industrial loans, 48% loans secured by real estate, 35% loans to individuals and 3% other loans.

In determining the size and capacity of BOWV for CRA evaluation purposes, we specifically considered operating subsidiaries of the bank. None of the bank's operating subsidiaries contributes to or detracts from the CRA performance of the bank.

There were three affiliated entities that contributed to the bank's CRA performance. Refer to Appendix A for identification of these entities and the activities they contributed.

There are no significant financial barriers limiting BOWV's ability to meet the identified credit needs within its assessment area.

BOWV delineates five assessment areas within the state of West Virginia for CRA purposes. The bank's Huntington assessment area includes all of Cabell and Wayne Counties in West Virginia. The Huntington MSA is a multi-state MSA, but the bank's assessment area and all of its branches are located in the West Virginia portion of the MSA. Therefore, for evaluation purposes, we did not treat this as a multi-state MSA. The bank has another assessment area in the Charleston MSA and 3 separate assessment areas in non-metropolitan parts of the state. The non-metropolitan assessment areas are Logan County, Beckley (includes all or portions of Fayette and Raleigh counties) and Clarksburg (all of Harrison and Upshur counties).

Scope of the Evaluation

Evaluation Period/Products Evaluated

The last evaluation of the bank was dated June 30, 1997. The current evaluation assesses the bank's performance from July 1, 1997 to December 31, 1999. Community Development Lending will be evaluated from July 1, 1997 to March 31, 2000. Under the lending test, we considered home purchase, home improvement, refinance, small business, and community development loans. Management elected not to provide home mortgage loans made by affiliates for our consideration in the evaluation.

There were several changes to the bank's assessment area delineation(s) during the evaluation period. Late in 1998, the Jefferson County assessment area was deleted due to the sale of branches in that area. The bank's performance in that area will not be considered in this evaluation. The bank's performance in Barbour, Lincoln, Mason, Mingo and Nicholas Counties will not be considered in this evaluation due to the sale of branches in those counties during the second quarter of 1998 and their deletion from the assessment area(s). The bank's performance in those areas would not have been significant to the evaluation. The branch sales also resulted in Fayette and Raleigh Counties being changed from full to partial counties in the assessment areas. We will use the partial county delineations for the entire evaluation period. Late 1999, the Non-MSA assessment area was divided into three assessment areas (Beckley, Clarksburg, and Logan). We will evaluate the bank's performance in the three separate areas during the entire evaluation period.

Data Integrity

The scope of the examination included a review of the accuracy of the bank data analyzed to develop our conclusions and ratings. We tested the data made available to the public in accordance with the Home Mortgage Disclosure Act (HMDA) and the CRA regulation. Public data includes home mortgage lending and small loans to businesses. We also reviewed the accuracy of non-public data for qualified investments, community development services, and community development loans.

We found the bank's HMDA, qualified investment, community development service, and community development loan data to be sufficiently accurate for us to use in our evaluation. The errors noted in this data were not significant. We did identify a 10% error rate in the business revenue data reported in 1999 for small loans to businesses. Higher error rates for revenue data had been noted in previous years. The other reported data for these loans was accurate. We used the small loans to business data reported by the bank in our analysis, but did not consider the revenue data in the evaluation. As a result of this exclusion, we did not develop a conclusion regarding the distribution of small loans to businesses by income level of borrower.

Selection of Areas for Full-Scope Review

We selected the Huntington multi-state MSA and the three non-metropolitan areas for full scope reviews. We note that 26% of BOWV's deposits are from the Huntington assessment area and 49% of the bank's deposits are from the three non-metropolitan areas combined. The Charleston assessment area received a limited scope review.

The data contained in the tables in Appendix C was evaluated for the banks delineated assessment areas. For the areas receiving full scope reviews, additional information was developed concerning credit and community development needs, and opportunities for community development activities. A detailed analysis was performed of the geographic distribution of lending to determine if there were any significant, unexplained gaps in the bank's lending. Individual community development loans, services and qualified investments were reviewed to assess qualitative factors such as complexity, innovation, leadership and responsiveness to identified needs. The Service Test analysis included an analysis of the location of bank branches to gauge accessibility.

Ratings

The bank's overall rating is based primarily on the bank's performance in the Huntington MMSA and the non-metropolitan areas. The bank's performance in the non-metropolitan areas was given more weight proportionate to the greater concentration of bank deposits originating in those areas.

In both the Huntington MMSA and the non-metropolitan assessment areas, small loans to businesses were given the greatest weight under the Lending Test. This weighting resulted from small loans to businesses having the greatest volume of dollars extended and a significant number of loans. Refinance lending had the greatest number of loans made and received stronger consideration in the evaluation also. The number of home improvement loans was significant, but the number of home mortgage loans was modest and this product received less consideration.

Other

Information regarding credit needs within the Huntington MMSA and the non-metropolitan areas was obtained through three community contacts, information from the Department of Housing and Urban Development and information developed by examiners during CRA examinations of other banks in West Virginia. We found that there are relatively limited community development lending, investment and service opportunities in Huntington and the non-metropolitan assessment areas, but opportunities do exist and the needs in these areas are great.

Fair Lending Review

We reviewed BOWV's HMDA data to determine whether any potentially discriminatory lending patterns were apparent that would warrant more detailed comparative loan file reviews. We analyzed the disposition of Black and Hispanic home mortgage applications the bank received in 1998 and 1999 in the assessment areas focused on for the CRA examination. We used the 1998 aggregate HMDA data for all mortgage lenders in these areas to compare with BOWV's data. The 1999 aggregate data had not been released at the time of this review. We also took the demographic characteristics of each assessment area into account.

BOWV had a very limited number of HMDA loan applications from minorities in 1998 and 1999, from both the Huntington and the non-metropolitan assessment areas. Receipt of a limited number of HMDA loan applications from Blacks and Hispanics is a reflection of the demographics of the assessment areas. The Black population makes up 4.4% of the total population and Hispanics make up 0.6%. This limited our ability to analyze the bank's lending performance regarding discriminatory practices. As a result, we limited our analysis to lending to Blacks. Our analysis did not reveal any trends that warrant additional file work. Denial rates were high for both Blacks and Whites, and denial disparities were comparable to those in the aggregate data for all lenders.

Conclusions with Respect to Performance Tests

LENDING TEST

Conclusions for Areas Receiving Full-Scope Reviews

Overall performance under the Lending Test is adequate. This conclusion is based on adequate performance in both the Huntington and the combined non-metropolitan assessment areas.

Lending Activity

Refer to Tables 1 - 5 in Appendix C for the data used in this analysis.

The overall volume of lending in West Virginia is adequate. This conclusion is based on an adequate volume in both Huntington and the non-metropolitan assessment areas. Adequate volumes of home mortgage and small business lending were noted in both assessment areas. Community development lending volume was excellent in Huntington, but only adequate in the non-metropolitan assessment areas. There were no small farm loans made during the evaluation period.

The bank's overall volume of home mortgage lending is adequate. However, a poor volume of home purchase loans is noted. In this product, market rank and market share are significantly lower than the bank's deposit market rank in both full scope areas. We did note that the bank did not elect to have the mortgage lending of its affiliated mortgage company considered in this analysis. The bank's volume of home improvement loans is excellent. The loan market rank for this product approaches or equals the bank's deposit market rank in both assessment areas, though the market shares are somewhat lower. For refinance lending, the market ranks are somewhat lower than the deposit market ranks, and volume is rated adequate for both assessment areas.

Small business lending volume is adequate in the Huntington and the non-metropolitan assessment areas. The market ranks are somewhat lower than the deposit ranks in both areas.

There were no small loans to farms.

There is a good volume of community development loans in West Virginia. The volume was excellent in Huntington with 9 loans representing 22.7% of the volume of Tier 1 capital allocated to this assessment area based on the percentage of deposits originating there. The volume of community development loans in the non-metropolitan area was adequate with 4 loans for 1.2% of allocated Tier 1 capital. We use the volume of loans as a percentage of Tier 1 capital to help gauge the volume of community development lending.

Distribution of Loans by Income Level of Geography

The distribution of loans by income level of geography is good. The geographic distribution is good in the non-metropolitan areas and excellent in Huntington. Excellent distributions of home mortgage loans were noted in both the non-metropolitan areas and Huntington. The geographic distribution of small loans to businesses is adequate, with an adequate distribution in the non-metropolitan areas and a good distribution in Huntington.

The reader should note that in developing our conclusions, more consideration was given to the percentage distribution of loans than to market share data. The emphasis on the percentage distribution data results from the fact that the lending data used in this calculation covered the entire evaluation period, whereas market share data was only for 1998.

Home Mortgage Loans

Refer to Tables 2, 3, and 4 in Appendix C for the data used in this analysis.

The geographic distribution of home purchase loans is poor in the non-metropolitan assessment areas and excellent in Huntington. There were no low-income census tracts in the non-metropolitan assessment areas. In moderate-income census tracts, the percentage of loans was substantially lower than the percentage of the assessment areas' owner-occupied units located in those areas and was poor. In the Huntington assessment area, the percentage of loans in both low- and moderate-income tracts exceeds the percentage of owner-occupied units in those tracts and the distribution was excellent. The analysis of market share information was not meaningful in either assessment area due to the negligible market share.

The geographic distribution of home improvement loans is excellent in the non-metropolitan and Huntington assessment areas. Both performance measures reflect excellent performance in the non-metropolitan assessment areas. The percentage of loans in moderate-income areas is greater than the percentage of owner-occupied units, and the bank's market share in moderate-income areas is greater than the bank's overall market share. In Huntington, there were no home improvement loans in low-income census tracts in Huntington, but there were also a nominal number of owner-occupied units in these areas. The percentage of loans in moderate-income tracts was excellent as it exceeded the percentage of owner-occupied units therein. The market share comparison indicates similar results.

The geographic distribution of refinance loans is excellent in both full scope assessment areas. The percentage of bank loans in moderate-income areas exceeds the percentage of owner-occupied units in both assessment areas, while the low percentage of bank loans in Huntington's low-income tracts is mitigated by the lack

of owner-occupied units. The analysis of market share for the product reveals excellent performance. Specifically, the market share by tract income exceeds the overall market share for low-income tracts in Huntington and moderate-income tracts in both areas.

Small Business Loans

Refer to Table 5 in Appendix C for the data used in this analysis.

The geographic distribution of small loans to businesses is adequate in the non-metropolitan assessment areas and good in Huntington. In the non-metropolitan assessment areas, the percentage of bank loans is substantially less than the percentage of businesses located in moderate-income areas and is poor. The market share data, which measures the bank's performance relative to other lenders, reflects excellent performance with the bank's market share in moderate-income areas greater than the bank's overall market share. The two measures are blended together for the overall rating. The percentage of small loans to businesses in low-income areas is excellent in Huntington and exceeds the percentage of businesses in low-income areas. In moderate-income areas, the geographic distribution is adequate with the percentage of bank loans somewhat lower than the percentage of businesses in moderate-income areas. The market share data for Huntington reflects excellent performance in both low- and moderate-income census tracts.

Small Farm Loans

Refer to Table 6 in Appendix C for the data used in this analysis.

There were no small farm loans made during the evaluation period.

Lending Gap Analysis

There were no unexplained gaps in lending for the charter.

Inside/Outside Ratio

The percentage of loans made within the bank's assessment areas is adequate. We found that 69% of home mortgage and 64% of small loans to businesses were made within the bank's assessment areas. Note that this measurement only considered loans made by the bank and did not include affiliate loans considered in other parts of the examination.

Distribution of Loans by Income Level of the Borrower

Overall, the distribution of loans by income level of borrower is adequate for BOWV. Performance in the non-metropolitan assessment areas and in the Huntington assessment area is adequate. The distribution of home mortgage loans by income

level of borrower is adequate in the non-metropolitan assessment areas and good in Huntington. As noted earlier, we did not have the information to analyze the distribution of small loans to businesses by income level of borrower. This omission tempered the performance in home mortgage lending and resulted in the overall conclusion stated above.

The reader should note that our analysis of lending by borrower income level took into account the percentage of individuals within an assessment area living below the poverty level and the affordability of housing. These variables impacted our expectations regarding the level of home mortgage lending to low-income borrowers.

Home Mortgage Loans

Refer to Tables 7, 8 and 9 in Appendix C for the data used in this analysis.

Borrower distribution for home purchase loans is adequate in the non-metropolitan assessment areas and poor in Huntington. The percentage of loans to low- and moderate-income borrowers in Huntington and low-income borrowers in non-metropolitan West Virginia is substantially below the percentage of families in these income categories. The percentage of loans to moderate-income borrowers in the non-metropolitan assessment areas exceeds the percentage of moderate-income families in the area and is excellent. The bank's market share data for this product was not analyzed due to the nominal market share.

The percentage distribution of home improvement loans by borrower income level is excellent in both full scope areas. The percentage of bank loans to moderate-income borrowers significantly exceeded the percentage of families in that income category. The percentage of loans to low-income borrowers was excellent also when the level of individuals living below the poverty level was taken into account. The market share data reflected similar performance for low- and moderate-income borrowers as the bank's market share of loans to those borrowers exceeded the bank's overall market share.

The bank's refinance lending represented good performance in Huntington and adequate performance in the non-metropolitan assessment areas. Performance is poor with regards to low-income borrowers in both assessment areas, with the percentage of loans to low-income borrowers substantially lower than the percentage of low-income families even considering the level of poverty. The percentage of loans to moderate-income borrowers equals the percentage of families in that category in Huntington and is excellent. In non-metropolitan WV, performance is poor with the percentage of loans to moderate-income borrowers substantially lower than the percentage of families. The market share data reflects excellent performance in both income categories, and this performance relative to the bank's peers resulted in the adequate overall conclusion for the non-metropolitan assessment

areas.

Small Business Loans

Refer to Table 10 in Appendix C for the data used in this analysis.

A conclusion was not developed for this aspect of the bank's lending performance. This situation is the result of data integrity issues noted earlier. We did note in all assessment areas that a moderate to high percentage of the bank's small loans to business were in amounts of \$100,000 or less. However, loan size is not a reliable indicator of the extent that the bank's small loans to businesses were made to small businesses.

Small Farm Loans

Refer to Table 11 in Appendix C for the data used in this analysis.

As noted above, there were no small farm loans originated or purchased during the evaluation period.

Community Development Lending

In non-metropolitan WV, community development lending is adequate and has a neutral impact on the bank's lending activities. Community development loans represent 1.2% of the volume of Tier 1 capital allocated to these assessment areas based upon the percentage of deposits originating there. Seventy-two percent of dollars extended supported the revitalization and/or stabilization of low- and moderate-income areas and the remaining monies supported services to low- and moderate-income individuals. In Huntington, community development lending is excellent and has a positive impact on lending activities. The dollar volume of loans represent 22.7% of allocated Tier 1 capital. In Huntington, 41% of dollars extended revitalized and/or stabilized low- and moderate-income areas, 31% related to community services and 28% supported affordable housing. During the evaluation period, the bank's lending helped create or retain 42 affordable housing units and 1,000 low- and moderate-income jobs. The bank's responsiveness and leadership is good in Huntington as exhibited in the two examples of community development loans that follow:

Huntington High Renaissance Project:

The bank provided two loans for this project, a pre-development loan and a construction loan. The rehabilitation of the old Huntington High School, built in the early 1900's, will create 42 housing units for low- and moderate-income elderly residents. Residents must be senior citizens with incomes at or below 60% of the area's median income. In addition to the creation of affordable housing, this project will provide a fine art facility and will help to expand the services currently offered by the

YMCA. The YMCA currently offers recreational facilities, a daycare center for low- and moderate-income families and an educational program for at-risk children. BOWV played a lead role in preparing the project's financing. Funding involved historic tax credits, funding from the Federal Home Loan Bank, an equity investment by BOCDC and HOME and CDBG funds through the City of Huntington. A bank officer is a board member of the Housing Development Corporation and was involved in the project's development. The project is responsive to the need for affordable housing and is considered complex due to the multiple funding sources.

Robson Prichard Building:

Two loans were made for the purchase and renovation of a building located in a low-income area. The building is also located in the City of Huntington's targeted Enterprise Zone. The building will house a newly chartered bank and a large company moving its operations to Huntington. The company will create approximately 1,000 jobs for low- and moderate-income individuals. This project is responsive to the City of Huntington's economic development initiative of redevelopment of the business district and creating new jobs for the area.

Product Innovation and Flexibility

BOWV's efforts to provide flexible-lending products are adequate and this performance criteria has a neutral impact on the overall Lending Test rating. In addition to offering an array of consumer and business loan products, the bank offers through its affiliated mortgage company one product that specifically targets low- and moderate-income individuals or areas. This is the Bank One Affordable Dream Mortgage introduced in 1999. The program is geared to low- and moderate-income borrowers with incomes at or below 80% of medium income who have limited cash for down payment and closing costs. The program requires a minimum investment of \$500 or one percent of the home's sale price with the remaining amount of down payment and closing costs allowed to be paid from other sources. The minimum down payment is three percent, and private mortgage insurance is not required. This program is offered throughout the Bank One Corporation. It is a relatively new program and information regarding its impact on low- and moderate-areas or individuals is not yet available.

The bank offers the SBA's Express, Low-Doc, 504, and 7A programs. However, information could not be provided on how these programs resulted in lending to low- and moderate-income areas or borrowers.

Conclusions for Areas Receiving Limited Scope Reviews

Based on a limited-scope review, the bank's performance under the Lending Test in the Charleston MSA is not inconsistent with the bank's overall Low Satisfactory rating for the Lending Test.

INVESTMENT TEST

Conclusions for Areas Receiving Full-Scope Reviews

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

BOWV's performance under the Investment Test is adequate. This conclusion is based on adequate performance in the Huntington and the non-metropolitan assessment areas.

Dollar Amount of Qualified Investments

The volume of qualified investments is adequate in Huntington and in non-metropolitan West Virginia. Our conclusions considered the fact that there are significant community development needs in these areas, but opportunities for investment are limited, particularly in the non-metropolitan assessment areas. This gap between need and opportunity points to a great need for capacity building of community-based organizations. The bank has provided grants to a number of community-based organizations, but the amounts are modest resulting in a low level of investments in the non-metropolitan assessment areas. To assist in gauging the volume of investments, we allocated Tier 1 capital to the assessment areas based upon the percentage distribution of bank deposits. Investments represent 2.2% and 0.2% of Tier 1 capital in Huntington and non-metropolitan W. Virginia, respectively. Specific to the non-metropolitan assessment areas, a significant performance context issue contributes to the conclusion that the level of investments is adequate. There are 3 prior period investments with original amounts totaling \$1.9 million that have been written down to no value under generally accepted accounting principles. Accordingly, these investments are not included in the investment totals in Table 12. However, these investments indicate the bank has participated in investment opportunities that have been available. It is also noted that \$1.6 million of the investments are still providing benefits to the bank's assessment areas since new loans are made as previous loans are paid back.

Innovativeness or Complexity of Qualified Investments

Investments reflect few complex and no innovative characteristics. In Huntington, one prior period investment was complex due to the involvement of tax credits, grants and other city and federal government funding. Investments in the non-metropolitan assessment areas consist of grants to community-based organizations and are not complex.

Responsiveness of Qualified Investments to Credit and Community Development Needs

The bank's overall responsiveness to the area's most pressing needs is adequate in Huntington and the non-metropolitan assessment areas. The adequate assessment in the non-metropolitan assessment areas is primarily due to the low volume of investments. The investments made were responsive to identified needs with 91% of the investments to provide services to low- and moderate-income individuals and to support economic development. Nine percent of investments support the creation and/or retention of affordable housing. In Huntington, the bank's responsiveness to the most pressing credit needs is adequate as 69% of the bank's investments was for the creation, retention and/or support of affordable housing, 21% for community services and 10% for economic development. The creation of affordable housing was identified as a need in Huntington. We also note that there is a significant affordable housing project in process at this time, but not yet reflected in the numbers considered during the examination. One example of a responsive community development investment is the grant funds provided to a not-for-profit organization promoting economic development in Cabell and Wayne counties. In addition to targeting their efforts to the expansion and retention of small and medium-sized businesses, this organization administers a loan pool established by local financial institutions. They also receive state and federal funds and grants to assist new and expanding businesses. Additional details are found under community development services. Another responsive investment includes a grant provided to a community development financial institution. The grant was modest in amount, but helped fund a state-wide affordable housing seminar. An in-kind donation of office furniture and equipment was also made to this group.

In Huntington, there was an unfunded equity commitment to assist with the Huntington High Renaissance Project. (See Community Development Loans for additional details). Although the amount was not considered in our conclusions, it does reflect the bank's efforts in helping local community organizations create affordable housing.

Conclusions for Areas Receiving Limited-Scope Reviews

Based on a limited-scope review, the bank's performance under the Investment Test in the Charleston MSA is weaker than the bank's overall Low Satisfactory performance under the Investment Test. The volume of investments in Charleston is low, and there is opportunity for additional investments. The bank's performance in this MSA did not significantly impact the overall rating for the bank.

SERVICE TEST

Conclusions for Assessment Areas Receiving Full-Scope Reviews

The bank's service test performance in West Virginia is good. Accessibility to services is good in both the non-metropolitan and Huntington assessment areas.

Retail Banking Services

Refer to Table 13 in Appendix C for the data used in this analysis.

Accessibility of Delivery Systems

The accessibility of the bank's retail services is good in both full scope assessment areas.

In the non-metropolitan assessment areas, the percentage of bank branches in moderate-income areas exceeds proportion the percentage of the population living in those areas. No unreasonable geographic gaps were noted in the branch network and, overall, access to the bank's branches is good. This conclusion recognizes that the non-metropolitan assessment areas cover a large area, but that most of it is rural in nature and lacks economic development. As with most other businesses, the bank's branches are located within the area's towns.

Overall, performance in Huntington is good with regards to accessibility. The percentage of branches in low-income areas exceeds the percentage of the population living in those areas and accessibility is excellent in these areas. Although there are no branches in moderate-income areas, the population living in those areas has reasonable access to branches in other income areas. Again, the outlying parts of the assessment area are rural, with more difficult, but reasonable access. As a result, access from moderate-income areas is adequate. No unreasonable geographic gaps were noted in the branch network, and overall, access to the bank's branches is good.

The bank promotes access to banking services through a variety of means, however, we could not discern that these services promote access by low- or moderate-income individuals. As a result, these services did not receive significant consideration in our analysis. BOWV has an active toll-free "loan-by-phone" system. A consumer can apply for a loan (home equity loans, home equity lines of credit, installment loans, and credit cards) over the telephone twenty-four hours a day, seven days a week, in English or Spanish.

Changes in Branch Locations

Branch activity during the evaluation period was adequate and had minimal impact in the low- or moderate-income areas of non-metropolitan West Virginia and Huntington. There were no openings during the evaluation period. The one branch closed during the evaluation period in the Huntington assessment area was in a low-income census tract. The branch was located in the downtown area. Another branch is located in an adjacent tract and provides reasonable access to services. The three branches closed in the non-metropolitan assessment areas were in middle-income census tracts. Each of these locations has a branch remaining in the same or an adjacent census tract.

Reasonableness of Business Hours and Services in Meeting Assessment Area Needs

The reasonableness of business hours and services offered at branch locations is good in both assessment areas. Each branch office is a full-service banking center and the hours of operation are consistent across the branches. All of the low- and moderate-income branches in the non-metropolitan and Huntington assessment areas have Saturday hours as do other branches in these assessment areas.

Community Development Services

The responsiveness of bank's services to the needs in both the Huntington and non-metropolitan assessment areas is good and contributes positively to the bank's overall service test activities. The level of community development services was also good in Huntington and in non-metropolitan WV.

Innovativeness and Responsiveness of Community Development Services Provided

BOWV's responsiveness to identified credit needs is good in Huntington and non-metropolitan WV. The bank's services respond to economic development, affordable housing needs and community services for low- and moderate-income individuals.

Extent of Community Development Services Provided

The bank provided a good level of community development services to organizations and individuals in both the Huntington and non-metropolitan assessment areas.

In Huntington, services were provided to or in conjunction with 30 organizations that address low- and moderate-income housing, economic development and other community development service needs. Twenty-four employees provided these services and most hold leadership positions as Board or committee members in the organizations. Employees have spoken and instructed about small business services, represented the bank on various housing and economic development committees, served on a small business

revolving loan fund committee, served on job creation advisory committees, and provided organizations financial technical expertise in applying for various government funding programs. One specific example is the involvement of two bank officers in the Huntington Area Development Council Organization. This organization has been instrumental in targeting small and medium-sized businesses for expansion and retention in the Huntington metropolitan area. A significant number of jobs have been created as a result of the organization's efforts.

In non-metropolitan WV, services were provided to or in conjunction with 25 organizations that address low- and moderate-income housing, economic development and other community development service needs. Twenty-one employees provided such services and most hold leadership positions as Board or committee member in these organizations. Actual services provided are similar to those in Huntington. Some specific community development services include a bank officer serving on the board or committee of organizations supporting affordable housing, economic development or community services as follows:

- West Virginia Alternative Housing Finance Group - Its purpose is to explore alternative funding sources for affordable owner-occupied, rental and multi-family housing. Currently, the group is working to establish a mortgage loan pool for affordable housing for low- and moderate-income people. Organizations represented in the group include two banks, two banking regulatory agencies, Community Works in WV and the West Virginia Housing Development Fund.
- Women's Resource Center -- The center provides shelter, counseling, approved schooling, medical care and meals for low- and moderate-income victims of domestic violence, and their children.

Conclusions for Areas Receiving Limited Scope Reviews

Based on a limited-scope review, the bank's performance under the Service Test in the Charleston MSA is consistent with the bank's overall High Satisfactory performance under the Service Test.

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 metropolitan and non-metropolitan areas 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	Lending Test (excludes CD Loans): 07/01/97 to 12/31/99 Investment and Service Tests and CD Loans: 07/01/97 to 03/31/-00	
Financial Institution		Products Reviewed
Bank One West Virginia (BOWV) Huntington, West Virginia		Home purchase, home improvement, and refinance loans, small business loans, community development loans, investments, and services.
Affiliate(s)	Affiliate Relationship	Products Reviewed
Bank One, NA Bank One Arizona, NA Bank One Texas, NA	Bank Affiliate Bank Affiliate Bank Affiliate	Small Business Loans Small Business Loans Small Business Loans
List of Assessment Areas and Type of Examination		
Assessment Area	Type of Exam	Other Information
Huntington MMSA	Full Scope	MMSA 3400
Non-metropolitan Logan	Full Scope	Non-MSA, Logan, Beckley and Clarksburg analyzed on a combined basis.
Non-metropolitan Beckley	Full Scope	Non-MSA
Non-metropolitan Clarksburg	Full Scope	Non-MSA
Charleston MSA	Limited Scope	MSA 1480

Appendix B: Market Profiles for Full-Scope Areas

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Market Profiles for Areas Receiving Full-Scope Reviews

Huntington MSA.....	26
Non-Metro Areas.....	27 - 28

Bank One West Virginia Huntington

Demographic Information for Full-Scope Area: Huntington MSA 3400						
Demographic Characteristics	#	Low % of #	Moderate % of #	Middle % of #	Upper % of #	NA % of #
Geographies (Census Tracts)	43	7.0	23.2	41.9	23.2	4.7
Population by Geography	138,463	4.0	21.9	45.4	28.7	0.0
Owner-Occupied Housing by Geography	37,282	0.5	20.1	48.5	30.9	0.0
Businesses by Geography	4,287	19.0	15.3	40.2	25.5	0.0
Farms by Geography	58	0.0	12.1	44.8	43.1	0.0
Family Distribution by Income Level	38,565	22.9	16.6	18.8	41.7	0.0
Distribution of Low- and Moderate-Income Families throughout AA Geographies	15,256	2.0	32.0	47.0	19.0	0.0
Median Family Income HUD Adjusted Median Family Income for 1999 Households Below the Poverty Level	= \$26,374 = \$35,200 = 20.66%	Median Housing Value Unemployment Rate November 30, 1999			= \$49,997 = 3.94%	

Source: 1990 U.S. Census and 1999 HUD updated MFI.

The Huntington MSA is a multi-state MSA (MMSA) consisting of Cabell and Wayne counties in West Virginia and Boyd, Carter and Greenup counties in Kentucky. The Huntington MMSA is located in the central portion of West Virginia and the eastern portion of Kentucky. The bank has designated one assessment area in the Huntington MMSA. BOWV's assessment area includes all of Cabell and Wayne Counties in West Virginia. No changes were made to the assessment area during this evaluation period. Due to the bank not having branches in the Kentucky portion of the MMSA, the bank's assessment area is not treated as a multistate assessment area for the purposes of the Interstate Banking and Branching Act. In terms of deposit market share, BOWV is the largest bank in the MMSA with a market share of 24.3% according to the June 30, 1999 FDIC Deposit Market Share Reports. City NB of WV rank's 2nd with 17.9% deposit market share.

Information regarding credit needs in the Huntington MMSA was obtained through the Department of Housing and Urban Development's Office of Community Planning and Development (HUD). A Consolidated Plan submitted to HUD by the Cabell-Huntington-Wayne Housing Consortium identified credit needs as rehabilitation of aging rental and owner-occupied housing, rental and homebuyer assistance for low- and moderate-income households, and the creation of more affordable housing, especially for persons with special needs, such as the handicapped. There are several organizations within the Huntington MMSA focusing on affordable housing and support for low- and moderate-income individuals, however, new construction is a challenge due to the lack of land for development. Overall, there are limited

community development lending, investment and service opportunities in which the banks may participate.

Non-Metropolitan Areas

Demographic Information for Full-Scope Area: Non-Metropolitan Areas						
Demographic Characteristics	#	Low % of #	Moderate % of #	Middle % of #	Upper % of #	NA % of #
Geographies (Census Tracts)	56	0.0	8.9	75.0	16.1	0.0
Population by Geography	235,396	0.0	5.8	79.5	14.7	0.0
Owner-Occupied Housing by Geography	66,987	0.0	6.0	78.7	15.3	0.0
Businesses by Geography		0.0	7.3	71.1	21.6	0.0
Farms by Geography		0.0	3.9	77.5	18.6	0.0
Family Distribution by Income Level	66,116	21.3	17.0	19.0 1	42.7	0.0
Distribution of Low- and Moderate-Income Families throughout AA Geographies	25,311	0.0	7.7	82.7	9.6	0.0
Median Family Income HUD Adjusted Median Family Income for 1999 Households Below the Poverty Level	= \$22,655 = \$30,000 = 20.5%	Median Housing Value Unemployment Rate November 30, 1999				= \$43,298 = 4.23%

Source: 1990 U.S. Census and 1999 HUD updated MFI.

The non-metropolitan area for BOWV consists of 3 geographically diverse assessment areas that are being reviewed on a combined basis for this analysis. The Logan assessment area is in the southwestern portion of the state and encompasses the entire Logan County. The Beckley assessment area is in the southeastern part of the state adjacent to the Charleston metropolitan area. This assessment area includes 7 of 11 census tracts which make up Fayette county and 14 of the 15 census tracts that comprise Raleigh county. The third assessment area, Clarksburg, is in the northern part of the state and includes all of Harrison and Upshur counties. We measured the size of BOWV in relation to other banks in these assessment areas using deposit information and assessed the bank's position on a county by county basis. BOWV has a number 1 deposit market share in Harrison, Logan and Upshur counties with deposit market shares of 25%, 34% and 54% respectively. In Raleigh county the bank ranks second with a deposit market share of 24.6% and in Fayette county the bank ranks fourth with a 14% market share. This deposit data indicates the significance of the bank's market presence in these areas. Our information on deposits was obtained from the June 30, 1999 FDIC Deposit Market Share Reports. The bank has a total of 11 branches in the non-metropolitan area with 2 in Harrison county, 2 in Logan county, 1 in Upshur county, 4 in Raleigh county and 2 in Fayette county.

Each of the assessment areas suffers from high unemployment. Four of the five counties have unemployment rates above the state average. The same four counties have median household incomes significantly below the state average. None of the non-metropolitan assessment areas have geographies that are designated low-income, but there is a significant level of low- and moderate-income families dispersed throughout the assessment areas. The percentage of

families living below the poverty level is high. The above factors all point to the need for economic development. The need for affordable housing is high, and this includes both single-family and multi-family housing. A special need is noted for affordable single and multi-family housing for the elderly including assisted living. The estimated cost of constructing a new affordable single-family house is \$55,000. Given the low-income levels, subsidy funds are needed. Subsidy funds are available through the State of West Virginia Department of Housing and certain United States Department of Agriculture programs. However, there is a significant need for capacity building of community-based organizations and the development of public/private programs to leverage available funds and programs. We also noted the aging of the existing housing stock and the subsequent need for home rehabilitation loans. Financial services education is another identified need and this includes the need for homebuyer education and technical assistance to small businesses.

Our efforts to develop information on the credit and community development needs of the non-metropolitan assessment areas included 3 community contacts and research of public sources regarding demographic information.

Appendix C: Tables of Performance Data

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: 07/01/1997 TO 12/31/1999												
MSA/Assessment Area	% of Rating Area Deposits in AA*	Home Mortgage		Small Business		Small Farm		Community Development		Total Reported Loans		% of Rating Area Loans in AA (% of #)
		#	\$ (000's)	#	\$ (000's)	#	\$ (000's)	#	\$ (000's)	#	\$ (000's)	
Full Scope												
Non Metro West Virg	48.8	816	24,399	392	42,257	0	0	4	756	1,212	67,412	37.4
Huntington, WV	25.9	658	21,513	237	31,729	0	0	9	7,538	904	60,780	33.7
Limited Scope												
Charleston, WV	25.3	532	16,513	278	35,349	0	0	1	283	811	52,145	28.9

* Deposit Data as of June 30, 1999

Table 2. Geographic Distribution of Home Purchase Loans

Geographic Distribution: HOME PURCHASE																Evaluation
Period: 07/01/1997 TO 12/31/1999																
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		Over all	Low	Mod	Mid	Upp	#	% of Total **
Full Scope																
Non Metro West Virginia	0.0	0.0	6.0	2.2	78.7	71.7	15.3	26.1	29	0.6	0.0	0.0	0.7	0.3	46	32.6
Huntington, WV	0.5	4.3	20.1	26.1	48.5	28.3	30.9	41.3	28	0.7	0.0	1.8	0.6	0.5	46	32.6
Limited Scope																
Charleston, WV	0.1	2.0	17.5	18.4	58.0	49.0	24.4	30.6	40	0.4	0.0	0.6	0.3	0.4	49	34.8

* Based on 1998 Aggregate HMDA Data Only. Market rank is for all income categories combined.

** Home purchase loans within an MSA/AA as a % of all home purchase loans in the rating area.

Table 3. Geographic Distribution of Home Improvement Loans

Geographic Distribution: HOME IMPROVEMENT Period: 07/01/1997 TO 12/31/1999										Evaluation						
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		Over all	Low	Mod	Mid	Upp	#	% of Total **
Full Scope																
Non Metro West Virginia	0.0	0.0	6.0	7.5	78.7	78.0	15.3	14.5	2	20.9	0.0	21.2	20.1	25.5	255	35.1
Huntington, WV	0.5	0.0	20.1	29.6	48.5	46.1	30.9	24.3	1	16.4	0.0	31.6	12.9	13.3	267	36.8
Limited Scope																
Charleston, WV	0.1	0.0	17.5	22.5	58.0	54.4	24.4	23.0	7	4.6	0.0	6.0	3.6	6.3	204	28.1

* Based on 1998 Aggregate HMDA Data Only. Market rank is for all income categories combined.

** Home improvement loans within an MSA/AA as a % of all home improvement loans in the rating area.

Table 4. Geographic Distribution of Home Mortgage Refinance Loans

Geographic Distribution: HOME MORTGAGE REFINANCE Period: 07/01/1997 TO 12/31/1999										Evaluation						
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		Over all	Low	Mod	Mid	Upp	#	% of Total **
Full Scope																
Non Metro West Virginia	0.0	0.0	6.0	7.2	78.7	71.4	15.3	21.4	9	3.1	0.0	8.0	3.2	2.0	514	45.2
Huntington, WV	0.5	0.3	20.1	21.8	48.5	45.3	30.9	32.6	10	2.6	14.3	3.7	2.5	2.3	344	30.3
Limited Scope																
Charleston, WV	0.1	0.0	17.5	12.9	58.0	54.5	24.4	32.6	27	0.9	0.0	1.0	0.9	0.7	279	24.5

* Based on 1998 Aggregate HMDA Data Only. Market rank is for all income categories combined.

** Refinance loans within an MSA/AA as a % of all refinance loans in the rating area.

Table 5. Geographic Distribution of Small Loans to Businesses

Geographic Distribution: SMALL BUSINESS											Evaluation					
Period: 07/01/1997 TO 12/31/1999																
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**
Full Scope																
Non Metro West Virginia	0.0	0.0	7.3	3.1	71.1	64.5	21.6	32.4	10	3.7	0.0	5.6	3.0	5.6	392	43.2
Huntington, WV	19.0	21.1	15.3	12.2	40.2	33.3	25.5	33.3	7	7.8	11.4	9.0	5.7	8.4	237	26.1
Limited Scope																
Charleston, WV	13.3	17.6	18.7	20.1	45.1	36.7	23.0	25.5	9	3.7	6.7	4.5	3.1	2.9	278	30.7

* Based on 1998 Aggregate Small Business Data Only. Market rank is for all income categories combined.

** Small Business loans within an MSA/AA as a % of all Small Business loans in the rating area.

Table 6. Geographic Distribution of Small Loans to Farms

Geographic Distribution: SMALL FARM											Evaluation					
Period: 07/01/1997 TO 12/31/1999																
MSA/Assessment Area	Low Income Geographies		Moderate Income Geographies		Middle Income Geographies		Upper Income Geographies		Overall Market Rank*	Market Share by Geography*					Total Loans 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**
Full Scope																
Non Metro West Virginia	0.0	0.0	3.9	0.0	77.5	0.0	18.6	0.0	0	0.0	0.0	0.0	0.0	0.0	0	0
Huntington, WV	0.0	0.0	12.1	0.0	44.8	0.0	43.1	0.0	0	0.0	0.0	0.0	0.0	0.0	0	0
Limited Scope																
Charleston, WV	1.1	0.0	11.8	0.0	58.1	0.0	29.0	0.0	0	0.0	0.0	0.0	0.0	0.0	0	0

* Based on 1998 Aggregate Small Business Data Only. Market rank is for all income categories combined.

** Small Farm loans within an MSA/AA as a % of all Small Farm loans in the rating area.

Table 7. Borrower Distribution of Home Purchase Loans

Borrower Distribution: HMDA HOME PURCHASE Period: 07/01/1997 TO 12/31/1999										Evaluation						
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
Full Scope																
Non Metro West Virginia	21.3	4.4	17.0	28.3	19.0	26.1	42.7	37.0	29	0.6	0.0	0.8	0.8	0.5	46	32.6
Huntington, WV	22.9	2.2	16.6	8.7	18.8	17.4	41.7	50.0	28	0.7	0.8	0.3	0.8	0.4	46	32.6
Limited Scope																
Charleston, WV	21.2	4.1	18.4	18.4	21.0	18.4	39.5	49.0	40	0.4	0.3	0.5	0.6	0.2	49	34.8

* Based on 1998 Aggregate HMDA Data Only. Market rank is for all income categories combined.

** As a percentage of loans with borrower income information available.

Table 8. Borrower Distribution of Home Improvement Loans

Borrower Distribution: HOME IMPROVEMENT Period: 07/01/1997 TO 12/31/1999										Evaluation						
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
Full Scope																
Non Metro West Virginia	21.3	10.6	17.0	20.4	19.0	24.3	42.7	43.5	2	20.9	28.3	23.9	15.7	21.7	255	35.1
Huntington, WV	22.9	10.5	16.6	21.7	18.8	25.8	41.7	40.8	1	16.4	18.6	18.1	18.0	14.8	267	36.8
Limited Scope																
Charleston, WV	21.2	16.7	18.4	24.0	21.0	23.0	39.5	33.8	7	4.6	6.8	5.6	3.4	3.7	204	28.1

* Based on 1998 Aggregate HMDA Data Only. Market rank is for all income categories combined.

** As a percentage of loans with borrower income information available.

Table 9. Borrower Distribution of Home Mortgage Refinance Loans

Borrower Distribution: HOME MORTGAGE REFINANCE										Evaluation						
Period: 07/01/1997 TO 12/31/1999																
MSA/Assessment Area	Low Income Families		Moderate Income Families		Middle Income Families		Upper Income Families		Overall Market Rank*	Market Share by Borrower Income*					Total Loans	
	% of Families	% Bank Loans**	% of Families	% Bank Loans**	% of Families	% Bank Loans**	% of Families	% Bank Loans**		Overall	Low	Mod	Mid	Upp	#	% of Total
Full Scope																
Non Metro West Virginia	21.3	3.5	17.0	10.3	19.0	22.0	42.7	60.7	9	3.1	3.8	5.7	5.1	3.1	514	45.2
Huntington, WV	22.9	4.9	16.6	16.6	18.8	23.5	41.7	50.6	10	2.6	3.1	3.6	4.3	2.3	344	30.3
Limited Scope																
Charleston, WV	21.2	7.2	18.4	12.5	21.0	21.9	39.5	54.8	27	0.9	1.6	0.7	0.5	1.0	279	24.5

* Based on 1998 Aggregate HMDA Data Only. Market rank is for all income categories combined.

** As a percentage of loans with borrower income information available.

Table 10. Borrower Distribution of Small Loans to Businesses

Borrower Distribution: SMALL BUSINESS										Evaluation	
Period: 07/01/1997 TO 12/31/1999											
MSA/Assessment Area	Businesses With Revenues of \$1 million or less			% Distribution of Loans by Original Amount Regardless of Business Size			Market Share*		Total Small Business Loans		
	% Business**	% Bank Loans**	% Market Loans*	\$100,000 or less	>\$100,000 to \$250,000	>\$250,000 to \$1,000,000	All	Rev \$ 1 Million or Less	#	% of Total	
Full Scope											
Non Metro West Virginia	--	--	--	74.7	15.8	9.4	3.7	--	392	43.2	
Huntington, WV	--	--	--	70.0	18.1	11.8	7.8	--	237	26.1	
Limited Scope											
Charleston, WV	--	--	--	73.0	16.9	10.1	3.7	--	278	30.7	

* The market consists of all other Small Business reporters in Bank's assessment area and is based on 1998 Aggregate Small Business Data Only

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

*** Loans to businesses with revenues of \$1 million or less as a percentage of all loans reported as small loans to businesses.

Table 11. Borrower Distribution of Small Loans to Farms

Borrower Distribution: SMALL FARM										Evaluation	
Period: 07/01/1997 TO 12/31/1999											
MSA/Assessment Area	Farms With Revenues of \$ 1 million or less			% Distribution Loans by Original Amount Regardless of Farm Size			Market Share*		Total Small Farm Loans		
	% Farms**	% Bank Loans***	% Market Loans*	\$100,000 or less	>\$100,000 to \$250,000	>\$250,000 to \$500,000	All	Rev \$ 1 Million or Less	#	% of Total	
Full Scope											
Non Metro West Virginia	--	--	--	0	0	0	0.0	--	0	0	
Huntington, WV	--	--	--	0	0	0	0.0	--	0	0	
Limited Scope											
Charleston, WV	--	--	--	0	0	0	0.0	--	0	0	

* The market consists of all other Small Farm reporters in Bank's assessment area and is based on 1998 Aggregate Small Business Data Only

** As a Percentage of Farms with known revenues.

*** As a percentage of loans with borrower income information available.

Table 12. Qualified Investments

QUALIFIED INVESTMENTS										Evaluation	
Period: 07/01/1997 TO 3/31/00											
MSA/Assessment Area	Prior Period Investments*		Current Period Investments		Total Investment			Unfunded Commitments**			
	#	\$(000's)	#	\$(000's)	#	\$(000's)	% of Total	#	\$(000's)		
Full Scope											
Non Metro West Virginia	0	0	32	108	32	108	11.7	0	0		
Huntington, WV	1	480	34	253	35	733	79.3	1	1,975		
Limited Scope											
Charleston, WV	0	0	45	83	45	83	9.0	0	0		

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

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

Table 13. Distribution of Branch Delivery System

DISTRIBUTION OF BRANCH DELIVERY SYSTEM 07/01/1997 TO 12/31/1999														Evaluation Period:			
MSA/Assessment Area	Deposits % of Total Bank Deposits	Branches						Branch Openings/Closings						Population			
		# of Bank Branches	% of Total Bank Branches	Location of Branches by Income of Geographies (%)				# of Branch Closings	# of Branch Openings	Net gain(+) / loss(-) of Branches due to openings/closings				% of the Population with Each Geography*			
				Low (%)	Mod (%)	Mid (%)	Upp (%)			Low	Mod	Mid	Upp	Low	Mod	Mid	Upp
Full Scope																	
Non Metro West Virginia	48.8	11	42.3	0.0	9.1	63.6	27.3	3	0	0	0	-3	0	0.0	5.8	79.5	14.7
Huntington, WV	25.9	6	23.1	16.7	0.0	66.7	16.7	1	0	-1	0	0	0	4.0	21.9	45.4	28.7
Limited Scope																	
Charleston, WV	25.3	9	34.6	11.1	33.3	33.3	22.2	1	0	0	0	-1	0	0.8	19.1	57.6	22.5

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

