



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 Wheeling-Steubenville, NA
Charter Number: 13914

1114 Market Street
Wheeling, West Virginia 26003

Office of the Comptroller of the Currency

Large Bank Division
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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, Wheeling-Steubenville, NA** with respect to the Lending, Investment, and Service Tests:

Performance Levels	Bank One, Wheeling Steubenville, NA Performance Tests		
	Lending Test*	Investment Test	Service Test
Outstanding			
High Satisfactory		X	X
Low Satisfactory	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.

The major factors that support this rating include:

Lending Test

- An adequate volume of lending. Home mortgage lending was good in Wheeling with an excellent level of refinance lending noted. An adequate level of home mortgage lending was noted in Steubenville. The volume of small loans to businesses was adequate in both assessment areas.
- Good geographic distribution of lending by income level of geography. The distribution of lending was good in both assessment areas, as was the distribution of home mortgage loans. The distribution of small loans to businesses was good overall as a result of a good distribution in Wheeling.
- An adequate distribution of loans by borrower income level. The distribution of refinance loans, the largest volume product, is adequate and we did not have information regarding the distribution of small loans to businesses.
- Adequate product innovation and flexibility. The bank has a limited number of products targeted towards low- and moderate-income individuals, but has no information on their effectiveness.

Investment Test

- A good volume of investments. The volume is excellent in Wheeling, but poor in Steubenville. More consideration was given to performance in Wheeling due to the significantly greater bank presence in this assessment area.
- A good level of complexity in the bank's investments. A good level of complexity was noted in Wheeling, but none was noted in Steubenville. No innovation was noted in either assessment area.
- Good responsiveness to assessment area needs. Excellent responsiveness was noted in Wheeling with investments that addressed the identified needs of the rehabilitation and development of affordable housing. The responsiveness in Steubenville was poor due to the low volume of investments.

Service Test

- Access to the bank's services is good in both rating areas. Access is good from low- and moderate-income areas and reasonable for the rest of the assessment areas.
- An adequate record of opening and closing branches. Neither assessment area had branches opened or closed in low- or moderate-income areas.
- Reasonable business hours and services offered. The bank's hours and services were consistent across the bank's branch networks in both assessment areas.
- Good community development services in both assessment areas. The services responded to identified needs in both rating areas.

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, Wheeling-Steubenville 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 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 at least 80% and less than 120% of the MFI.

Moderate-Income - Income levels 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, Wheeling-Steubenville, N.A., (BOWS), headquartered in Wheeling, 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.

BOWS ranks twenty-fifth in terms of deposit market share in the State of West Virginia. As of December 31, 1999, BOWS reported total assets of \$358 million, total loans of \$83.6 million, and a loan-to-deposit ratio of 28%. Tier 1 capital totals \$29.6 million. BOWS operates eight banking centers and eight ATM's throughout Ohio and West Virginia. As of December 31, 1999, BOWS's loan portfolio consisted of 13% commercial and industrial loans, 56.8% loans secured by real estate, 26.6% loans to individuals and 2.5% municipal loans.

In determining the size and capacity of BOWS 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 seven affiliated banks and two affiliated non-bank entities that contributed to the bank's CRA performance. Refer to Appendix A for identification of the entities and the activities they contributed.

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

BOWS delineates two assessment areas within the States of West Virginia and Ohio for CRA purposes. The bank's Steubenville assessment area includes Jefferson County, Ohio and Brooke County in West Virginia. However the bank's branches are all located in the state of Ohio. Therefore, for evaluation purposes, we did not treat this as a multi-state MSA. The Wheeling assessment area includes a portion of Belmont County, Ohio and all of Marshall and Ohio counties in West Virginia.

Scope of the Evaluation

Evaluation Period/Products Evaluated

The last evaluation of the bank was dated December 13, 1996. The current evaluation assesses the bank's performance from December 14, 1996 to March 31, 2000. Community Development Lending was evaluated from December 14, 1996 to March 31, 2000. Under the lending test, we considered home purchase, home improvement, refinance and small business loans from January 1, 1997 to December 31, 1999. We considered community development loans, qualified investments and Service Test information for the entire evaluation period. There were several changes to the bank's assessment area delineation(s) during the evaluation period. Late in 1998, Harrison county, Ohio and Wetzell county, West Virginia, both in non-metropolitan areas, were deleted due to the sale of branches. The bank's performance in those areas will not be considered because they were not significant parts of their respective assessment areas.

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

For our review, we selected both the Steubenville and Wheeling assessment areas for full scope reviews. We are required to rate the Wheeling assessment area separately because it is a multi-state MSA. The Steubenville assessment area was reviewed using full scope procedures in order to allow us to rate the bank's activities in the State of Ohio. We note that sixty-eight percent of the bank's total deposits are from the Wheeling MMSA and thirty-two percent of the bank's deposit are from the

Steubenville MSA.

The data contained in the tables in Appendix C was evaluated for the banks delineated assessment areas. Also, as part of a full scope review, additional information was developed concerning credit and community development needs, and opportunities for community development activities in both assessment areas. 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.

The Service Test analysis included an evaluation of the location of bank branches to gauge accessibility.

Ratings

The bank's overall rating is based on the bank's performance in the Steubenville and Wheeling assessment areas. The Wheeling assessment area was given more weight in arriving at the overall rating because this assessment area is the source of 68% of the bank's deposits versus 32% for Steubenville.

Other

Information regarding credit needs within the Steubenville MSA and the Wheeling MMSA was obtained through the Department of Housing and Urban Development. There are only a few organizations within the bank's assessment area focusing on affordable housing and support for low- and moderate-income individuals. Overall, there are limited community development lending, investment and service opportunities for banks to participate in.

Fair Lending Review

We reviewed BOWS'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 home mortgage applications the bank received in 1998 and 1999 in each of the bank's assessment areas. We used the 1998 aggregate HMDA data for all mortgage lenders in these areas to compare to BOWS'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.

BOWS received a very limited number of HMDA loan applications from minorities in 1998 and 1999. Receipt of the limited number of HMDA loan applications from Blacks and Hispanics are a reflection of the demographics of the assessment areas. Blacks make up 3% of the population and Hispanics make up 0.4%. This limited our ability to analyze the bank's lending performance regarding discriminatory practices. Consequently, our analysis focused on Black denial rates and denial disparity ratios. Our analysis did not reveal disparities that warranted additional investigation. Denial rates were high for both Blacks and Whites, but the denial disparities are comparable to those seen in the aggregate data for all lenders.

Multistate Metropolitan Area Rating

CRA Rating for the Wheeling, West Virginia Multistate

Metropolitan Statistical Area:

Overall Rating: Satisfactory

The Lending Test is rated: Low

Satisfactory

The Investment Test is rated:

Outstanding

The Service Test is rated:

High Satisfactory

The major factors that support this rating include:

Lending Test

- An adequate volume of lending. A good volume of home mortgage loans was noted, along with an adequate volume of small loans to businesses. The bank had no community development loans and a nominal number of small loans to farms. Refinance lending was the largest volume category and was excellent.
- A good distribution of loans by income level of geography. The bank's home mortgage and small loans to businesses lending in moderate-income census tracts was excellent. Lending to the assessment area's low-income census tract was poor, but this tract contained a modest number of owner-occupied housing units and businesses, and performance here was given less weight.
- An adequate distribution of loans by borrower income level. The distribution for the largest volume category, refinance loans, was adequate. Home purchase lending was the next largest category and lending performance here was good, with home improvement lending excellent. We were unable to analyze the bank's lending to small businesses due to the data integrity problems discussed earlier and this deficiency negatively impacted the overall conclusion.
- Adequate innovation and flexibility in lending products. One special loan product and participation in 5 programs for small businesses were noted, but we could not gauge the impact of these programs due to the lack of information.

Investment Test

- An excellent level of investments. The volume of investments was significant in relation to the bank's presence in the assessment area and all of the investments were made in the current evaluation period.
- A good degree of complexity in the bank's investments. We noted two complex investments.

- Excellent responsiveness to the assessment area's identified needs. The bulk of the bank's investments were for the development of affordable rental housing, economic development and the revitalization of the community. These were all identified needs of the assessment area.

Service Test

- Good accessibility to banking services. Access to banking services is excellent from moderate-income areas and reasonable for all parts of the assessment area.
- Adequate record of opening and closing branches. There were no branch openings or closings during the evaluation period.
- Adequate business hours and services. The services offered and hours of operation are consistent across the branch network.
- Good community development services. The level of services provided is good and addresses the need for affordable housing and economic development.

Description of Institution's Operations in Wheeling, West Virginia Multistate Metropolitan Statistical Area (MMSA)

Refer to the Market Profile for the Wheeling, West Virginia MMSA in Appendix C for detailed demographics and other performance context information. BOWS operates 5 branches in this assessment area and it is the source of 68% of the bank's deposits.

LENDING TEST

The bank's Lending Test performance in the Wheeling MMSA is adequate.

Lending Activity

Refer to Tables 1, 2, 3 and 4 in the MMSA section of Appendix D for the facts and data used to evaluate the bank's lending activity.

BOWS's volume of lending in the Wheeling assessment area is adequate. Refinance lending was the bank's largest lending category ranking third in the market. The market rank for this product was higher than the bank's deposit market rank of sixth, and the volume of refinance loans is excellent. The volume of home purchase loans was good with a fifth place market rank, but lower market share than noted for refinance lending. Home improvement lending was adequate with a rank somewhat less than the bank's deposit market rank. The volume of small loans to businesses was also adequate with a market rank somewhat less than the bank's deposit market rank. There were a nominal number of small loans to farms and no community development loans made in the assessment area.

Distribution of Loans by Income Level of the Geography

The distribution of loans by income level of geography is good in the Wheeling assessment area.

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 (3 years), whereas market share data was only for 1998.

In analyzing the bank's lending performance in this assessment area, the most weight was given to the bank's refinance lending performance because this was the product with the largest volume of lending. The good volume of home purchase lending was considered, though the volumes of home improvement and small loans to business lending were significant and not discounted. This weighting of performance was used with the other assessment factors also.

Also note that we did not analyze the bank's performance in making small loans to farms because there was an insufficient volume of loans to perform a meaningful analysis. The data on small loans to farms is included in the tables in Appendix D for your information.

Home Mortgage Loans

Refer to Tables 2, 3 and 4 in the MMSA section of Appendix D for the facts and data used to evaluate the geographic distribution of the bank's home mortgage loan originations and purchases.

The geographic distribution of home purchase loans is good. There were no loans made in the assessment area's low-income census tract, and the distribution in this area is poor. However, the lack of lending in this census tract was discounted because only .3% of the assessment area's owner-occupied units or 116 owner-occupied units are located there resulting in minimal home mortgage lending opportunity. This demographic fact also impacted the analysis of home improvement and refinance lending. The percentage of bank loans in moderate-income areas exceeded the percentage of owner-occupied units in those areas and was excellent. Market share data reflected the same performance levels as the percentage distribution data.

The distribution of home improvement loans is excellent. The percentage of home improvement loans in both low- and moderate-income census tracts exceeds the percentage of owner-occupied units in those areas and performance in both geographies is excellent. BOWS did not make any home improvement loans in the low-income census tract in 1998 resulting in a poor market share in this geographic category, but this result was discounted due to the modest lending opportunity. The moderate-income geography market share exceeded the bank's overall market share and was excellent.

The distribution of refinance loans is good. This was the bank's largest lending category and was given additional weight for that reason. There were no loans made in the low-income census tract and the distribution in there is poor. The percentage of loans in moderate-income census tracts exceeds the percentage of owner-occupied units in those areas and is excellent. The market share data reflects similar results.

Small Loans to Businesses

Refer to Table 5 in the MMSA section of Appendix D for the facts and data used to evaluate the geographic distribution of the bank's origination and purchase of small loans to businesses.

The geographic distribution of small loans to businesses is good. The percentage of small loans to businesses made by the bank in the low-income census tract is substantially below the percentage of businesses in those areas and is poor. The percentage of the bank's small loans to businesses in moderate-income census tracts is substantially the same as the percentage of businesses in those areas and

the geographic distribution is excellent in these areas. Note that only 2.4% or 81 of the assessment area's businesses are located in the low-income census tract. This fact resulted in the bank's performance in moderate-income areas being given more weight. The market share data for the bank reflected similar performance levels, though the bank's market share in moderate-income areas was good rather than excellent.

Lending Gap Analysis

There were no unexplained gaps in the geographic distribution of bank loans. Areas with lower levels of loans coincided with areas of limited lending opportunities.

Inside/Outside Ratio

The bank's focus on lending within its assessment areas versus outside is good. We noted that 83% of the number of bank loans were made to borrowers located within the assessment areas. The analysis only included loans made by the bank and did not include affiliate lending. This concentration of lending supported the good geographic distribution of lending conclusion.

Distribution of Loans by Income Level of the Borrower

The bank's distribution of loans by income level of borrower is adequate in Wheeling. 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 we observed in home mortgage lending and resulted in the overall conclusion stated above.

The reader should note that our analysis of lending to low-income borrowers took into account the percentage of individuals within the assessment area living below the poverty level. This segment of the population has relatively less borrowing capacity, and this factor impacted our expectations regarding the level of lending to low-income borrowers.

Home Mortgage Loans

Refer to Tables 7, 8 and 9 in the multi-state MSA section of Appendix D for the facts and data used to evaluate the borrower distribution of the bank's home mortgage loan originations and purchases.

The distribution of home purchase loans by borrower income level is good. The percentage of loans to low-income borrowers is substantially less than the percentage of low-income families in Wheeling and is poor even after considering the relatively lower borrowing capacity of this group. Lending to moderate-income borrowers is excellent with the percentage of loans to this income group substantially the same as the percentage of families in this category. Market share data indicated good performance for both low- and moderate-income borrowers and this contributed

to the overall conclusion for this product type.

The distribution of home improvement loans by borrower income level is excellent. The level of lending to both low- and moderate-income borrowers was excellent. The percentage of loans to moderate-income borrowers exceeded the percentage of families in this income category and the percentage of loans to low-income borrowers was at an excellent level considering the affordability issue. The bank's market share for both low- and moderate-income borrowers exceeded its overall market share and was excellent also.

The distribution of refinance loans is adequate. The percentage of bank loans to low-income borrowers was substantially below the percentage of families in this category and is poor. Lending to moderate-income borrowers is good with the percentage of loans to such borrowers close to the percentage of families in this income category. The market share data reflects slightly stronger performance than the percentage distribution information.

Small Loans to Businesses

Refer to Table 10 in the MMSA section of Appendix D for the facts and data used to evaluate the borrower distribution of the bank's origination/purchase of small loans to businesses.

A conclusion was not developed for this aspect of the bank's lending due to the data integrity issues discussed earlier. We did note that a high percentage of the bank's small loans to businesses 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.

Community Development Lending

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

There were no community development loans made by the bank during the evaluation period.

Product Innovation and Flexibility

BOWS efforts to provide flexible-lending products is 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 a product that specifically targets low- and moderate-income individuals: the Bank One Affordable Dream Mortgage. The program is geared to low- and moderate-income borrowers with incomes at or below 80% of medium income who have little cash for the down payment and closing costs. The program requires a minimum investment of \$500 or one percent of the home's sale price be made by the borrower with the remaining amount of down payment and closing costs

allowed to be paid from other sources. The minimum down payment is three percent, but 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-income areas or individuals is not yet available. Due to this lack of information on the impact of the program, we did not consider it in developing our conclusion.

The bank offers the Capital Access Program and 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 individuals and thus were not considered in developing our conclusion.

INVESTMENT TEST

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

The bank's performance under the Investment Test in the Wheeling assessment area is excellent.

Dollar Amount of Qualified Investments

The volume of qualified investments is excellent in the Wheeling assessment area. Several investments were noted in the assessment area. To assist in gauging the relative volume of investments, we calculated the amount of investments as a percentage of Tier 1 capital. We allocated a portion of the bank's Tier 1 capital to this assessment area based on the percentage of bank deposits originating here. The bank's investments in Wheeling represent 4.0% of Tier 1 capital. Our conclusion also considered the fact that in the Wheeling assessment area, the need for community development exists, but opportunities for investments are somewhat limited. All of the bank's investments were made during the current evaluation period and include the purchase of two municipal bonds, an investment in a limited partnership and grants to seven community-based organizations.

Innovativeness or Complexity of Qualified Investments

Two investments were considered to be complex, but none were innovative. Investments made through community groups are not considered complex. There were three direct community development project investments, and the two considered complex are detailed below:

129 15th St. Limited Partnership

This project involved rehabilitating a three-unit apartment building located in a low-income area that is undergoing economic revitalization. The area has also been designated as a Federal Historic District. Each unit consisted of three bedrooms and the units are for low- and moderate-income individuals. The City of Wheeling did not have the funds to renovate the building so they looked for alternative funding sources. Bank One was the sole investor in the project and their investment consisted of the purchase of Low-Income Housing Tax Credits (LIHTCs). The project is considered complex due to the multiple funding sources that included historic tax credits and Section 8 housing money in addition to the LIHTCs.

Marshall County Commercial Development Bond

This project involved the Ohio Valley Industrial & Business Center (OVIBDC). OVIBDC developed a 58,000-sq. ft. state-of-the-art call center for Teletech. This call center provides over 500 LMI jobs for the area. This project involved financing/incentives from the West Virginia Development Office, the West Virginia Economic Development Authority, the Marshall

County Commission and a consortium of local banks that purchased development bonds. The West Virginia Development office, in conjunction with TeleTech's training program coordinators, developed a six week training program for LMI individuals. This project helped to revitalize and stabilize this area by providing jobs to LMI individuals. The project is considered complex due to the use of public funds from multiple sources and the many investors involved.

Responsiveness of Qualified Investments to Credit and Community Development Needs

The responsiveness to the areas most pressing needs is excellent due to the level of investments made and the focus on identified needs in the assessment area. We noted that 30% of the bank's investments were for the creation, retention or support of affordable housing, 28% was for economic development, and 39% was for community revitalization and stabilization. Each of these categories correlates to identified needs within the assessment area.

SERVICE TEST

BOWS's branch network provides good access to banking services within its communities. Accessibility to banking services is supplemented by telephone, bank-at-work programs, and Internet banking. Changes in branch locations have not adversely affected the accessibility of the bank's delivery systems. Banking services, including hours of operation are reasonable for all of the bank's branches and facilities, including those located in low- and moderate-income areas. The level of CD services is good.

Conclusions for Assessment Areas Receiving Full-Scope Reviews

Service Test performance for the Wheeling assessment area is good.

RETAIL BANKING SERVICES

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

Accessibility of Delivery Systems

The distribution of branches in the Wheeling assessment area is good. The distribution is adequate for low-income areas and excellent for moderate-income areas. Although there is no branch located in the low-income census tract, less than 1% of the assessment area's population is located in this census tract. The percentage of bank branches in moderate-income areas significantly exceeds the percentage of the population living in those areas. Access to the bank's branches is reasonable for all parts of the assessment area. This conclusion recognizes the rural nature and lack of commercial development of the portions of the assessment area away from the river valley where the cities of Wheeling and Steubenville are located.

Access to the bank's services can be achieved in a number of ways. Although these different means of providing service are discussed below we were unable to 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. The bank has an active toll-free telephone loan access 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. In addition, several of the bank's services are accessible through the Internet. Internet services include online applications for checking, savings, and certificates of deposit. Loan applications are available on-line for credit cards, home equity loans, and home equity lines of credit, student loans, mortgages, business installment, business credit cards, and lines of credit for small businesses. Customers may also transfer funds between their BOWS accounts, pay bills, and get information on statements, investments, taxes

and insurance online.

Changes in Branch Locations

The bank's performance in regards to changes in branch locations is adequate. Branch activity during the evaluation period had neutral impact in low- and moderate-income areas of the assessment area with no branches opened or closed in these areas.

Reasonableness of Business Hours and Services in Meeting Assessment Area Needs

The reasonableness of business hours and services offered at branch locations is adequate for the moderate-income area branches of the Wheeling assessment area. Each branch is a full-service banking center and the hours of operation are fairly consistent with banking centers located in middle- and upper-income areas.

Community Development Services

We noted a good level of community development services in the Wheeling assessment area, and this conclusion contributed positively to the Service Test conclusion for this assessment area.

Innovativeness and Responsiveness of Community Development Services Provided

BOWS responsiveness to identified credit needs is adequate in Wheeling. The bank's services respond to the economic development and affordable housing needs in Wheeling and provided community services for low- and moderate-income individuals. Although services provided are responsive they are not considered innovative.

Extent of Community Development Services Provided

The level of community development services is good. Community development services were provided to ten organizations that address low- and moderate-income housing, economic development and other community development service needs. Eleven employees provided these services with most bank employees holding leadership positions in the organizations. Community development services included providing homebuyer counseling, job training for public housing residents interested in obtaining jobs, and hosting small business seminars.

State Rating

CRA Rating for Ohio¹: Satisfactory

The Lending Test is rated: Low
Satisfactory

The Investment Test is rated:

Needs To Improve

The Service Test is rated:

High Satisfactory

The major factors that support this rating include:

Lending Test

- An adequate volume of lending. Each of the bank's lending products had market ranks somewhat lower than the bank's deposit market rank in this assessment area.
- Good geographic distribution of lending by income level of geography. The distribution of home improvement loans is excellent and refinance lending is good. Home purchase lending was adequate. The bank's performance was stronger in moderate-income census tracts and these areas contained more of the assessment area's owner-occupied housing units. The geographic distribution of small loans to businesses was good.
- An adequate distribution of loans by borrower income level. The distribution for the largest volume loan product, refinance loans, is adequate. Home purchase and home improvement lending are good. We were unable to analyze the bank's lending to small businesses due to the data integrity problems discussed earlier, and this was considered a negative factor in developing the overall conclusion for this performance criteria.
- Adequate innovation and flexibility in lending products. One special loan product and participation in five programs for small businesses were noted, but we could not gauge the impact of these programs due to the lack of information.

Investment Test

- A poor volume of investments. The bank's investment activity was limited to grants. The volume of investments was low even considering the limited opportunities for investments.

¹ For institutions with branches in two or more states in a multistate metropolitan area, this statewide evaluation does not reflect performance in the parts of this state contained within the multistate metropolitan area. Refer to the multistate metropolitan area rating and discussion for the rating and evaluation of the institution's performance in that area.

- No complexity or innovation was noted in the bank's investments.
- Poor responsiveness to the community's need for the rehabilitation of existing housing and the development of additional affordable housing.

Service Test

- Good access to banking services. Access is convenient from low-income areas and reasonable from the rest of the community.
- An adequate record of opening and closing branches. The bank had a net loss of one branch during the evaluation period, but none were opened or closed in low- or moderate-income areas.
- Reasonable business hours and services. The hours of operation and services offered are fairly consistent across the branch network.
- A good level of community development services. The bank's services responded to the need for affordable housing and economic development.

Description of Institution's Operations in Ohio

Refer to the Market Profiles in Appendix C for detailed demographics and other performance context information for the Steubenville assessment area. Steubenville is the bank's only assessment area in the state of Ohio and we performed a full scope review of the bank's performance here. BOWS operates three branches in Steubenville, and the bank, as a whole, derives 32% of their deposits from there.

Scope of Evaluation in Ohio

The state rating is derived from the bank's performance in the Steubenville assessment area only. We did not make any community contacts during the examination, but did participate in a bank-sponsored tour of the assessment area. We also utilized information from contacts made by examiners during examinations of other banks and information from the community's development plan submitted to the Department of Housing and Urban Development.

Conclusions with Respect to Performance Tests

LENDING TEST

The bank's performance under the Lending Test is rated Low Satisfactory. The bank's lending test performance in the Steubenville assessment area is adequate.

Lending Activity

Refer to Table 1a. 2a., 3a. and 4a. in Appendix D for the facts and data used to evaluate the bank's lending activity.

BOWS's volume of lending in the Steubenville assessment area is adequate. An adequate volume of lending was noted for each of the products considered. In each case, the market ranks for these products was somewhat lower than the bank's fourth place deposit market rank. Refinance lending was the largest volume product, and the bank had a market rank of sixth. Home purchase, home improvement and small loans to businesses had market ranks of ninth, tenth and eighth respectively. The volume of community development lending was adequate with one loan made during the evaluation period. The dollar amount of this loan represented 1.2% of the amount of the bank's Tier 1 capital allocated to this assessment area based upon the percentage of bank deposits originating there. This method is used to help gauge the level of community development lending in different assessment areas. There were no small loans to farms made in this assessment area.

Distribution of Loans by Income Level of the Geography

The distribution of loans by income level of geography is good in the Steubenville assessment area.

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 (3 years), whereas market share data was only for 1998.

In analyzing the bank's lending performance in this assessment area, the most weight was given to the bank's refinance lending performance because this was the product with the largest volume of lending. The volumes of home purchase, home improvement and small loans to businesses were significant and not discounted. This weighting of performance was used with the other assessment factors also.

Home Mortgage Loans

Refer to Tables 2a. 3a. and 4a. in Appendix D for the facts and

data used to evaluate the geographic distribution of the bank's home mortgage loan originations and purchases.

The geographic distribution of home purchase loans in Steubenville is adequate. There were no loans made in low-income areas and the distribution in these areas is poor. However, we did note that only 2.2% or 683 of the assessment area's owner-occupied housing units are located in low-income areas resulting in limited home mortgage lending opportunity. This demographic fact resulted in relatively more consideration being given to the bank's performance in moderate-income areas. This consideration is true for home improvement and refinance lending also. The percentage of bank loans in moderate-income areas was somewhat less than the percentage of owner-occupied units in those areas and is adequate. Market share data was similar, though the data reflected poor performance in moderate-income areas.

The distribution of home improvement loans in Steubenville is excellent. The percentage of loans in both low- and moderate-income census tracts exceeds the percentage of owner-occupied units in those areas and performance in both geographies is excellent. BOWS did not make any home improvement loans in low-income census tracts in 1998 resulting in a poor market share in this geographic category. The moderate-income geography market share exceeded the bank's overall market share and is excellent.

The geographic distribution of refinance loans in Steubenville is good. A nominal number of loans were made in low-income areas, and the percentage of loans was substantially less than the percentage of owner-occupied units. The bank's performance in low-income census tracts is poor. The percentage of the bank's loans in moderate-income areas exceeded the percentage of owner-occupied units and is excellent. The market share data reflected adequate performance in moderate-income areas, but otherwise was consistent.

Small Loans to Businesses

Refer to Table 5a. in Appendix D for the facts and data used to evaluate the geographic distribution of the bank's origination and purchase of small loans to businesses.

The geographic distribution of small loans to businesses is good. The percentage of small loans to businesses made by the bank in low-income census tracts exceeded the percentage of businesses in those areas and is excellent. In moderate-income areas, the percentage of the bank's loans was substantially less than the percentage of businesses in those areas and the bank's performance is poor. The market share data reflected the same pattern.

Lending Gap Analysis

There were no unexplained gaps in the geographic distribution of

bank loans. Areas with lower levels of loans coincided with areas of limited lending opportunities.

Inside/Outside Ratio

The bank's focus on lending within its assessment areas versus outside is good. This conclusion was developed for the bank overall and is discussed in the corresponding section of the Lending Test comment for the Wheeling MMSA.

Distribution of Loans by Income Level of the Borrower

The bank's distribution of loans by income level of borrower is adequate in Steubenville.

The reader should note that our analysis of lending to low-income borrowers took into account the percentage of individuals within the assessment area living below the poverty level. This segment of the population has relatively less borrowing capacity, and this factor impacted our expectations regarding the level of lending to low-income borrowers.

Home Mortgage Loans

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

The distribution of home purchase loans by borrower income is good. The percentage of bank loans to low-income borrowers is less than the percentage of low-income families, but is excellent due to the borrowing capacity issue. For moderate-income borrowers, the percentage of bank loans is slightly less than the percentage of families in this category and is good. Market share data is similar, though the bank's market share for moderate-income borrowers was somewhat less than the bank's overall market share and just adequate.

The distribution of home improvement loans by borrower income level is good. The percentage of loans to low-income borrowers is substantially below the percentage of families in this category and is poor even considering the more limited borrowing capacity. The percentage of bank loans to moderate-income borrowers exceeds the percentage of families in this category and is excellent. The market share data reflects the same performance as the percentage lending data.

The distribution of refinance loans is adequate. The percentage of loans to low-income borrowers is substantially below the percentage of families in this category and is poor even considering the more limited borrowing capacity. The percentage of bank loans to moderate-income borrowers is slightly less than the percentage of families in this category and is good. The

market share data reflects excellent performance in the low-income group, but is given less weight due to the limited timeframe associated with the data set. The market share data for moderate-income borrowers is consistent with the percentage distribution data.

Small Loans to Businesses

Refer to Table 10a. in Appendix D for the facts and data used to evaluate the borrower distribution of the bank's origination and purchase of small loans to businesses.

A conclusion was not developed for this aspect of the bank's lending performance due to the data integrity issues discussed earlier. We did note that a high percentage of the bank's small business loans 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.

Community Development Lending

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

The bank's community development lending in the Steubenville assessment area is adequate. There was one community development loan noted in this assessment area.

Product Innovation and Flexibility

The comment for Steubenville is the same as the one made in this section of the Wheeling assessment area comment. Refer to that comment for details supporting the adequate conclusion and neutral impact this performance criterion has on the overall Lending Test rating for Ohio.

INVESTMENT TEST

The bank's performance under the Investment Test in the Steubenville assessment area is poor. Refer to Table 12a. in Appendix D for the facts and data used to evaluate the Investment Test performance.

Dollar Amount of Qualified Investments

The volume of qualified investments is poor in Steubenville. A minimal volume of investments was noted in the assessment area. To assist in gauging the relative volume of investments, we calculated the amount of investments as a percentage of Tier 1 capital. We allocated a portion of the bank's Tier 1 capital to this assessment area based upon the percentage of bank deposits originating here. The bank's investments in Steubenville represent .3% of Tier 1 capital. Our conclusion considered the fact that in the Steubenville assessment area the need for community development is great, but the opportunities for investment are limited. However, the bank has sufficient resources to pursue developing investment opportunities.

The bank's investments consisted of 9 grants totaling \$36,000. The majority of the donations were made to organizations that fund community services targeted to low- and moderate-income individuals. There are no investments being highlighted as examples.

Innovativeness or Complexity of Qualified Investments

No investments were considered to be complex or innovative. Investments made through community groups are not considered complex.

Responsiveness of Qualified Investments to Credit and Community Development Needs

The responsiveness to Steubenville's most pressing community development needs is poor due to the low level of investments made during the evaluation period. The rehabilitation of existing housing and the development of affordable housing are primary needs within the assessment area, but only 1.4% of the bank's investments addressed these needs.

SERVICE TEST

Retail Banking Services

Refer to Table 13a. in Appendix D for the data used to evaluate Service Test performance.

Accessibility of Delivery Systems

Branch distribution is good in the Steubenville assessment area.

The branch distribution is excellent in low-income areas and adequate in moderate-income areas. The percentage of the bank's branches in low-income areas significantly exceeds the percentage of the assessment area's population living in those areas. There are no branches located in moderate-income census tracts, but the percentage of the assessment area's population located in moderate-income census tracts is minimal. The bank has three branches serving the Steubenville assessment area and access to the bank's branches is reasonable for the entire community.

Access to the bank's services can be achieved in a number of ways. Although these different means of providing service are discussed below, we were unable to 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.

BOWS has an active toll-free telephone loan access 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. In addition, several of the bank's services are accessible through the Internet. Internet services include on-line applications for checking, savings, and certificates of deposit. Loan applications are available on-line for credit cards, home equity loans, and home equity lines of credit, student loans, mortgages, business installment, business credit cards, and lines of credit for small businesses. Customers may also transfer funds between BOWS accounts, pay bills, and get information on statements, investments, taxes and insurance.

Changes in Branch Locations

The bank's performance with regards to changes in branch locations is adequate. Branch activity during the evaluation period had neutral impact in low- and moderate-income areas of the assessment area with no branches opening or closing. Overall, there were two branch openings and three closings, all in middle-income census tracts.

Reasonableness of Business Hours and Services in Meeting

Assessment Area Needs

The reasonableness of business hours and services offered at branch locations is adequate for the low-income area branches. Each branch is a full-service banking center and the hours of operation are fairly consistent with the banking center located in the upper-income area.

Community Development Services

We noted a good level of community development services in the Steubenville assessment area, and this conclusion contributed positively to the service test conclusion for this assessment area.

Innovativeness and Responsiveness of Community Development Services Provided

BOWS responsiveness to identified credit needs is good in Steubenville. The bank's services respond to the economic development, affordable housing needs and community services for low- and moderate-income individuals. Although services provided are responsive, they are not considered innovative.

Extent of Community Development Services Provided

The level of Community Development services is good in the Steubenville assessment area. Community Development services were provided to six organizations and bank employees hold leadership positions in each. Community development services include providing homebuyer counseling and counseling low-income individuals on improving job interview skills. An employee provided technical assistance for small business development during an entrepreneur seminar. One bank employee is involved with Alliance 2000. The employee holds a leadership position in the organization as a board member. Alliance 2000 is responsible for establishing a 93-acre industrial park in 1999 and provided leadership that attracted over \$6 million in federal and state grants, loans, and business tax credits to revitalize and stabilize this area.

Appendix A: Scope of Evaluation

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 nonmetropolitan 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): 01/01/97 to 12/31/99 Investment and Service Tests and CD Loans: 12/14/96 to 03/31/00	
Financial Institution	Products Reviewed	
Bank One Wheeling-Steubenville, NA Wheeling, West Virginia	Home Purchase and refinanced loans, home improvement loans, small business loans, Community development loans, investments, and services.	
Affiliate(s)	Affiliate Relationship	Products Reviewed
Bank One West Virginia N.A.	Bank Affiliate	Home purchase, Home Improvement and Refinance Loans
Bank One, NA	Bank Affiliate	Small business, Home purchase, Home Improvement and Refinance Loans
Bank One Indiana, NA	Bank Affiliate	Small Business Loans
American National Bank and Trust	Bank Affiliate	Small Business Loans
Bank One Wisconsin, NA	Bank Affiliate	Small Business and Refinance Loans
Bank One Arizona, NA	Bank Affiliate	Small Business Loans
NBD Michigan	Bank Affiliate	Home Purchase and Refinance Loans
Bank One Financial Services	Holding Company Subsidiary	Home Purchase, Home Improvement and Refinance Loans
Bank One Mortgage	Holding Company Subsidiary	Home Purchase and Refinance Loans
List of Assessment Areas and Type of Examination		
Assessment Area	Type of Exam	Other Information
Wheeling MMSA Steubenville MSA	Full Scope Full Scope	MSA 9000 MSA 8080

**Appendix B: Summary of Multistate Metropolitan
Statistical Area and State Ratings**

RATINGS		Bank One Wheeling-Steubenville, NA		
Overall Bank:	Lending Test Rating*	Investment Test Rating	Service Test Rating	Overall Bank/State/Multistate Rating
BOWS	Low Satisfactory	High Satisfactory	High Satisfactory	Satisfactory
Multistate Metropolitan Statistical Area or State:				
Wheeling multistate MSA	Low Satisfactory	Outstanding	High Satisfactory	Satisfactory
Ohio	Low Satisfactory	Needs To Improve	High Satisfactory	Satisfactory

(*) The Lending Test is weighted more heavily than the Investment and Service Test in the overall rating.

Appendix C: Market Profiles for Full-Scope Areas

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Market Profiles for Areas Receiving Full-Scope Reviews	
Wheeling MMSA.....	34
Steubenville MSA.....	35

**Bank One Wheeling-Steubenville
Wheeling MMSA**

Demographic Information for Full-Scope Area: Bank One Wheeling-Steubenville (WV/OH) MMSA						
Demographic Characteristics	#	Low % of #	Moderate % of #	Middle % of #	Upper % of #	NA % of #
Geographies (Census Tracts)	44	2.3	18.2	59.1	18.2	2.3
Population by Geography	135,812	1.0	10.0	70.0	19.0	0.0
Owner-Occupied Housing by Geography	38,570	.3	6.8	72.9	20.0	0.0
Businesses by Geography	4,058	2.0	30.0	49.0	19.0	0.0
Farms by Geography	121	0.0	2.0	81.0	17.0	0.0
Family Distribution by Income Level	37,891	19.9	18.3	21.9	39.9	0.0
Distribution of Low- and Moderate-Income Families throughout AA Geographies	14,483	1.0	13.0	74.0	12.0	0.0
Median Family Income HUD Adjusted Median Family Income for 1999 Households Below the Poverty Level	= \$27,287 = \$36,500 = 16.49%	Median Housing Value Unemployment Rate November 30, 1999			= \$42,824 = 3.62%	

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

The Wheeling MSA is a multi-state MSA (MMSA) consisting of two counties in West Virginia (Marshall and Ohio) and one county in Ohio (Belmont). The Wheeling MMSA is located in the extreme northern portion of West Virginia and the southeastern portion of Ohio. The bank has designated one assessment area in the Wheeling MMSA. BOWS's assessment area includes all of Marshall and Ohio Counties in West Virginia and a portion of Belmont County in Ohio. No changes were made to the assessment area during this evaluation period. In terms of deposit market share, BOWS ranks sixth with an 8.4% deposit market share in the MMSA according to the June 30, 1999 FDIC Deposit Market Share Reports. Wesbanco Bank Wheeling ranks first with a 22.4% deposit market share.

Information regarding credit needs in the Wheeling MMSA was obtained through the Department of Housing and Urban Development's Office of Community Planning and Development (HUD) and information developed during examinations of other banks. Identified credit needs are rehabilitation of aging rental properties, rehabilitation of aging owner-occupied housing, and homebuyer assistance for low- and moderate-income households. There is also a great need for additional economic development of the area and revitalization of the existing commercial areas of the community. A local community collage maintains a Small Business Development Center where interested parties may obtain free counseling, technological and educational services for

small business. While the credit and community development needs are great, there is limited number of community-based organizations with programs in the area. As a result, there is a significant need to develop the capacity to address community development needs.

**Bank One Wheeling-Steubenville
Steubenville MSA**

Demographic Information for Full-Scope Area: Bank One Wheeling-Steubenville 8080						
Demographic Characteristics	#	Low % of #	Moderate % of #	Middle % of #	Upper % of #	NA % of #
Geographies (Census Tracts)	33	12.1	12.1	60.6	15.2	0.0
Population by Geography	107,290	5.4	7.9	75.9	10.8	0.0
Owner-Occupied Housing by Geography	31,046	2.2	7.9	78.7	11.2	0.0
Businesses by Geography	2,825	15.4	9.5	56.2	18.9	0.0
Farms by Geography	79	2.5	8.9	87.3	1.3	0.0
Family Distribution by Income Level	30,367	21.2	18.1	22.7	38.0	0.0
Distribution of Low- and Moderate-Income Families throughout AA Geographies	11,915	8.0	11.4	73.4	7.2	0.0
Median Family Income HUD Adjusted Median Family Income for 1999 Households Below the Poverty Level	= \$29,169 = \$38,100 = 16.48%	Median Housing Value Unemployment Rate November 30, 1999			= \$41,175 = 3.80%	

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

The Steubenville MSA is a multi-state MSA (MMSA) consisting of two counties in West Virginia (Brooke and Hancock) and one county in Ohio (Jefferson). The Steubenville MMSA is located in the extreme eastern portion of Ohio on the western side of the Ohio River and the extreme northern portion of the WV panhandle on the eastern side of the Ohio River. The bank has designated Brooke and Jefferson counties as its assessment area in the Steubenville MMSA. Although Steubenville is an MMSA, due to the bank not having any branches in West Virginia portion of the assessment area, we do not consider it a multi-state MSA for purposes of the Interstate Banking and Branching Act. In terms of deposit market share, BOWS ranks fourth with a 10.1% deposit market share in the MMSA according to the June 30, 1999 FDIC Deposit Market Share Reports. Sky Bank ranks first with a 35.4% deposit market share.

Information regarding credit needs in the Steubenville MMSA was obtained through the Department of Housing and Urban Development's Office of Community Planning and Development (HUD). Identified credit needs are rehabilitation of aging rental properties, aging owner-occupied housing, homebuyer assistance for low- and moderate-income households and construction of new housing units for low- and moderate-income renters and owners. Small business credit needs are financial and technical assistance to small business and minority/female-owned businesses. A local community college maintains a Small Business

Development Center where interested parties may obtain free counseling, technological and educational services for small business. While the credit and community development needs are great, there are a limited number of community based organizations with programs in the area. As a result, there is a significant need to develop the capacity to address community development needs.

Appendix D: 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 Evaluation. 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 01/01/1997 TO 12/31/1999												Evaluation Period:	
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													
Wheeling, WV	100.0	756	33,145	140	13,775	1	200	0	0	897	47,120	100.0	

Deposit Data as of June 30, 1999

Table 2. Geographic Distribution of Home Purchase Loans

Geographic Distribution: HOME PURCHASE Period: 01/01/1997 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 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																
Wheeling, WV	0.3	0.0	6.8	7.4	72.9	64.2	20.1	28.4	5	4.3	0.0	5.3	3.6	5.7	162	100.0

*Based on 1998 Aggregate HMDA Data Only. Market ranks 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															Evaluation	
Period: 01/01/1997 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 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																
Wheeling, WV	0.3	1.0	6.8	8.6	72.9	73.3	20.1	17.1	9	3.0	0.0	4.2	3.1	2.1	105	100.0

* 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															Evaluation	
Period: 01/01/1997 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 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																
Wheeling, WV	0.3	0.0	6.8	7.4	72.9	69.7	20.1	22.9	3	6.4	0.0	6.3	6.5	6.2	489	100.0

* 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: 01/01/1997 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		Over all	Low	Mod	Mid	Upp	#	% of Total **
Full Scope																
Wheeling, WV	2.4	1.4	30.0	28.6	48.9	40.7	18.8	29.3	10	2.3	0.0	2.0	2.0	3.6	140	100.0

* 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: 01/01/1997 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		Over all	Low	Mod	Mid	Upp	#	% of Total **
Full Scope																
Wheeling, WV	0.0	0.0	2.5	0.0	81.0	100.0	16.5	0.0	3	11.1	0.0	0.0	11.1	0.0	1	100.0

* 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															Evaluation	
Period: 01/01/1997 TO 12/31/1999																
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																
Wheeling, WV	19.9	4.9	18.3	17.3	21.9	29.0	39.9	35.8	5	4.3	4.6	3.9	4.8	3.8	162	100.0

* 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															Evaluation	
Period: 01/01/1997 TO 12/31/1999																
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																
Wheeling, WV	19.9	10.5	18.3	26.7	21.9	13.3	39.9	46.7	9	3.0	5.0	3.2	1.4	3.5	105	100.0

* 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: 01/01/1997 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**		Over all	Low	Mod	Mid	Upp	#	% of Total
Full Scope																
Wheeling, WV	19.9	3.9	18.3	15.3	21.9	21.9	39.9	45.4	3	6.4	5.7	7.9	6.6	6.3	489	100.0

* 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: 01/01/1997 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											
Wheeling, WV	--	--	--	80.0	9.3	10.7	2.3	--	140	100.0	

* The market consists of all other Small Business reporters in Bank One Wheeling Steubenville N.A.'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: 01/01/1997 TO 12/31/1999										
MSA/Assessment Area	Farms With Revenues of \$ 1million 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										
Wheeling, WV	--	--	--	0.0	100.0	0.0	11.1	--	1	100.0

* The market consists of all other Small Farm reporters in Bank One Wheeling Steubenville N.A.'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: 01/01/1997 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										
Wheeling, WV	0	0	27	873	27	873	100.0	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 01/01/1997 TO 12/31/1999														Evaluation Period:			
MSA/Assessment Area	Deposits	Branches						Branch Openings/Closings				Population					
	% of Total Rating Areas Deposits	# 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																	
Wheeling, WV	100.0	5	100.0	0	60.0	20.0	20.0	0	0	0	0	0	0	.7	9.5	70.9	18.8

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

Table 1a. Lending Volume

LENDING VOLUME 01/01/1997 TO 12/31/1999											Evaluation Period:	
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												
Steubenville, OH	100.0	432	18,024	75	6,308	0	0	1	125	507	24,457	100.0

Deposit Data as of June 30, 1999

Table 2a. Geographic Distribution of Home Purchase Loans

Geographic Distribution: HOME PURCHASE Period: 01/01/1997 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 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																
Steubenville, OH	2.2	0.0	7.9	5.1	78.7	86.4	11.2	8.5	9	2.5	0.0	1.3	3.0	1.2	59	100.0

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

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

Table 3a. Geographic Distribution of Home Improvement Loans

Geographic Distribution: HOME IMPROVEMENT															Evaluation	
Period: 01/01/1997 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 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																
Steubenville, OH	2.2	2.9	7.9	10.3	78.7	79.4	11.2	7.4	10	2.4	0.0	8.0	2.3	1.4	68	100.0

* 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 4a. Geographic Distribution of Home Mortgage Refinance Loans

Geographic Distribution: HOME MORTGAGE REFINANCE															Evaluation	
Period: 01/01/1997 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 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																
Steubenville, OH	2.2	0.7	7.9	9.2	78.7	74.1	11.2	16.1	6	4.0	0.0	3.1	4.2	3.9	305	100.0

* 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 5a. Geographic Distribution of Small Loans to Businesses

Geographic Distribution: SMALL BUSINESS														Evaluation		
Period: 01/01/1997 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		Over all	Low	Mod	Mid	Upp	#	% of Total
Full Scope																
Steubenville, OH	15.4	20.0	9.5	5.3	56.2	56.0	18.9	18.7	8	4.9	5.2	3.0	4.7	6.7	75	100.0

* 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 6a. Geographic Distribution of Small Loans to Farms

Geographic Distribution: SMALL FARM														Evaluation		
Period: 01/01/1997 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		Over all	Low	Mod	Mid	Upp	#	% of Total
Full Scope																
Steubenville, OH	2.5	0.0	8.9	0.0	87.3	0.0	1.3	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 7a. Borrower Distribution of Home Purchase Loans

Borrower Distribution: HMDA HOME PURCHASE															Evaluation	
Period: 01/01/1997 TO 12/31/1999																
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**		Over all	Low	Mod	Mid	Upp	#	% of Total
Full Scope																
Steubenville, OH	21.2	11.9	18.1	16.9	22.7	28.8	38.0	33.9	9	2.5	5.0	1.9	2.9	2.5	59	100.0

* 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 8a. Borrower Distribution of Home Improvement Loans

Borrower Distribution: HOME IMPROVEMENT															Evaluation	
Period: 01/01/1997 TO 12/31/1999																
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**		Over all	Low	Mod	Mid	Upp	#	% of Total
Full Scope																
Steubenville, OH	21.2	5.9	18.1	22.1	22.7	32.4	38.0	36.8	10	2.4	1.4	4.3	2.8	1.0	68	100.0

* 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 9a. Borrower Distribution of Home Mortgage Refinance Loans

Borrower Distribution: HOME MORTGAGE REFINANCE															Evaluation	
Period: 01/01/1997 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**		Over all	Low	Mod	Mid	Upp	#	% of Total
Full Scope																
Steubenville, OH	21.2	6.6	18.1	14.4	22.7	23.3	38.0	39.7	6	4.0	4.8	3.4	3.9	4.3	305	100.0

* 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 10a. Borrower Distribution of Small Loans to Businesses

Borrower Distribution: SMALL BUSINESS											Evaluation	
Period: 01/01/1997 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												
Steubenville, OH	--	--	--	76.0	21.3	2.7	4.9	--	75	100.0		

* The market consists of all other Small Business reporters in Bank One Wheeling Steubenville N.A.'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 11a. Borrower Distribution of Small Loans to Farms

Borrower Distribution: SMALL FARM										Evaluation
Period: 01/01/1997 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										
Steubenville, OH	--	--	--	0.0	0.0	0.0	0.0	--	0	0.0

* The market consists of all other Small Farm reporters in Bank One Wheeling Steubenville N.A.'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 12a. Qualified Investments

QUALIFIED INVESTMENTS										Evaluation
Period: 01/01/1997 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										
Steubenville, OH	0	0	9	36	9	36	100.0	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 13a. Distribution of Branch Delivery System

DISTRIBUTION OF BRANCH DELIVERY SYSTEM 01/01/1997 TO 12/31/1999														Evaluation Period:			
MSA/Assessment Area	Deposits	Branches						Branch Openings/Closings				Population					
	% of Rating Area Deposits	# 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																	
Steubenville, OH	100.0	3	100.0	66.7	0.0	0.0	33.3	3	2	0.0	0.0	-1	0.0	5.4	7.9	75.9	10.8

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

