



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, NA, Ohio
Charter Number: 7621

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Columbus, Ohio 43271

Office of the Comptroller of the Currency

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Washington D.C. 20219-0001

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, NA, Ohio** with respect to the Lending, Investment, and Service Tests:

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

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

The major factors that support this rating include:

Lending Test

- A good volume of lending. We noted a good volume of home mortgage lending. Offsetting a poor volume of home purchase loans, the bank had excellent volumes of home improvement and refinance loans. The bank had good volumes of small loans to businesses and small loans to farms.
- An excellent distribution of lending by income level of geography. The distribution of all three home mortgage products was excellent. The distribution of small loans to businesses was good.
- A good distribution of lending by income level of borrower. An excellent distribution of lending for home improvement and refinance lending was offset by an adequate distribution for home purchase loans and lack of information for small loans to businesses.
- Adequate product innovation and flexibility in lending. We lacked information to assess the impact of some of the bank's programs.

Investment Test

- An adequate volume of investments. The dollar volume of investments is modest and we noted that a moderate percentage was made in the current evaluation period.

- A moderate level of complexity in the bank's investments. We only noted one investment in the current evaluation period that was moderately complex. The complexity resulted from the multiple sources of financing used in some projects.
- Adequate responsiveness to community development needs. The bank's investments primarily responded to affordable housing needs.

Service Test

- A good distribution of branches. The percentage of bank branches in low- and moderate-income areas compared favorably to the percentages of the assessment area's population living in those areas. More weight was given to the moderate-income area percentage due to the greater portion of the population living in those areas.
- An adequate record of opening and closing branches. Branch closings did not significantly impact access to branches in low- or moderate-income areas.
- A reasonable distribution of hours and services offered across the branch network. The hours and services are consistent across the branch network.
- Adequate responsiveness to community development service needs. The bank's community development services were limited, but responded to the needs for affordable housing and community development services.

General Information

The Community Reinvestment Act (CRA) requires each federal financial supervisory agency to use its authority, when examining financial institutions subject to its supervision, to assess the institution's record of meeting the credit needs of its entire community, including low- and moderate-income neighborhoods, consistent with safe and sound operation of the institution. Upon conclusion of such examination, the agency must prepare a written evaluation of the institution's record of meeting the credit needs of its community.

*This document is an evaluation of the CRA performance of **Bank One, NA, OHIO** prepared by the **Office of the Comptroller of the Currency (OCC)**, the institution's supervisory agency, as of **March 31, 2000**. The agency evaluates performance in assessment area(s), as they are delineated by the institution, rather than individual branches. This assessment area evaluation may include the visits to some, but not necessarily all of the institution's branches. The agency rates the CRA performance of an institution consistent with the provisions set forth in Appendix A to 12 CFR Part 25.*

Definitions and Common Abbreviations

The following terms and abbreviations are used throughout this Performance Evaluation. The definitions are intended to provide the reader with a general understanding of the terms, not a strict legal definition.

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

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

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

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

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

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

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

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

(e.g., approved, denied, withdrawn).

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

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

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

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

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

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

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

Small 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, N.A., Ohio (BOO), headquartered in Columbus, Ohio, 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.

BOO is the third largest bank in Ohio and, in terms of deposits, has a 9.2% deposit market share. As of December 31, 1999, BOO reported total assets of \$33.9 billion, total loans of \$21.5 billion, and a loan-to-deposit ratio of 133%. BOO operates 284 banking centers and 410 ATM's throughout the State of Ohio. As of December 31, 1999, BOO's loan portfolio consisted of approximately 16% commercial and industrial loans, 43% loans secured by real estate, 25% loans to individuals and 15% leasing receivables.

In determining the size and capacity of BOO for CRA evaluation purposes, we specifically considered operating subsidiaries of the bank. Bank One Mortgage Company is an operating subsidiary of the bank and contributed positively to the CRA performance of the bank.

There were twelve affiliated banks and four 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 BOO's ability to meet the identified credit needs within its assessment area.

Scope of the Evaluation

Evaluation Period/Products Evaluated

The last evaluation of the bank was dated March 18, 1998. The current evaluation assesses the bank's performance from March 19, 1998 to March 31, 2000. Under the lending test, we considered home purchase, home improvement, refinance and small business data from January 1, 1998 to December 31, 1999. For the Investment and Service Tests and Community Development Loans, we considered activity from January 1, 1998 through March 31, 2000.

The reason data from before the date of the last evaluation was considered this time for each test is that the last evaluation only considered data through December 31, 1997.

There were several changes in the assessment area delineations during the evaluation period. In the third and fourth quarters 1998, some assessment areas consisting of full counties were changed to partial counties. These counties included Allen, Boone, Campbell, Clermont, Columbiana, Geauga, Hamilton, Kenton, Morrow, Richland, and Shelby. Due to these changes occurring early in the evaluation period, we considered these as partial counties during the entire evaluation period. Beginning third quarter 1998, Ashtabula, Brown, Carroll, Crawford, Erie, Guernsey, Hardin, Hocking, Logan, Ottawa, Perry, Pike, Sandusky, Seneca and Van Wert were deleted from their respective assessment areas due to the sale of branches or no ATM presence. Due to these counties being deleted early in the evaluation period, the bank's performance in these areas will not be evaluated. In the third quarter of 1999, Union and Darke Counties were changed from partial to full counties within the respective assessment areas.

We considered these partial assessment areas for the full evaluation period. Also beginning third quarter 1999, Fayette and Huron Counties were deleted from their respective assessment areas due to no branch presence. Due to these changes, the bank's performance in these counties was not considered during the evaluation period. During 1999, the bank divided the Non-Metropolitan assessment area into six distinct areas, Ashland-Wooster, Findley-Marion, Zanesville, Athens, Portsmouth and Sidney. We evaluated the bank's performance in these six areas during the evaluation period.

Data Integrity

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

The following significant errors were noted in the bank's small loans to businesses reporting:

- A 10% error rate was noted in the 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, 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.

The bank's qualified investments, community development loans and community development services information was found to be accurate.

Selection of Areas for Full-Scope Review

We selected the Cincinnati multi-state MSA and the Columbus MSA for full scope reviews. The bank's remaining assessment areas received limited scope reviews. Cincinnati received a full scope review in order to develop a separate rating for that area as required for all multi-state MSA's. BOO derives 3.9% of the bank's deposits from the Cincinnati assessment area. The bank's performance in the remaining assessment areas was evaluated to develop the bank's rating for the state of Ohio. The Columbus assessment area was chosen for a full scope review because a significant portion of the bank's business is conducted within this assessment area. We note that 50.2% of the bank's deposits from the assessment areas considered in the state of Ohio rating are from Columbus.

The data contained in the tables in Appendix C was evaluated for each of the bank's assessment areas and this data was factored into our conclusions. For the Cincinnati and Columbus assessment areas, which received full scope reviews, additional information was developed concerning credit and community development needs, and opportunities for community development activities. We also analyzed the geographic distribution of lending to determine if there were any significant, unexplained gaps in the bank's lending. Individual community development loans and services and qualified investments were reviewed to assess qualitative factors such as complexity, innovation, leadership and responsiveness to identified needs. The Service Test analysis included an analysis of the location of bank branches to gauge accessibility.

Ratings

The bank's overall rating is based primarily on its performance in the Columbus and Cincinnati assessment areas. These are the areas that received full scope reviews. We note that 48.2% of the bank's deposits originate in the Columbus assessment area and 3.9% of the bank's deposits originate in the Cincinnati assessment area. The bank's performance in the Columbus assessment area was given the greatest weight in developing our overall ratings consistent with the proportion of deposits originating there. Dayton is the second largest assessment area

in terms of deposits, and it is the source of 10.1% of the bank's deposits. This fact is mentioned to demonstrate the concentration of bank operations in the Columbus assessment area.

Fair Lending Review

We reviewed BOO's HMDA data to determine whether any potentially discriminatory lending patterns were apparent that would warrant more detailed comparative loan file reviews. We analyzed the disposition of Black and Hispanic home mortgage applications the bank received in 1998 and 1999 in the Columbus assessment area and applications from Blacks in the Cincinnati assessment area. The bank did not have a sufficient number of Hispanic applicants in Cincinnati to perform a meaningful analysis. The bank's lending ratios were compared to those in the aggregate HMDA data for all lenders in those assessment areas in 1998 and 1999. We also took the demographic characteristics of these assessment areas into account. We reviewed denial rates and denial disparities for Blacks and Hispanics, the bank's market share of loans to minorities compared to its overall market share, and the bank's record of lending to minority areas. Our analysis did not disclose any lending patterns suggestive of illegal discrimination in lending so no additional work was performed.

Multistate Metropolitan Area Rating

CRA Rating for the Cincinnati MMA of Ohio¹: Satisfactory

The Lending Test is rated:

High Satisfactory

The Investment Test is rated:

High Satisfactory

The Service Test is rated:

Satisfactory

Low

The major factors that support this rating include:

Lending Test

- An excellent volume of lending. The bank had excellent volumes of home improvement, refinance, small loans to businesses and community development lending.
- A good distribution of lending by income level of geography. The distribution of home mortgage loans was excellent, but the distribution of small loans to businesses was poor. The percentage of the bank's small loans to businesses made in both low- and moderate-income areas was significantly lower than the percentages of businesses in those areas.
- A good distribution of lending by borrower income level. The bank did an excellent job of making home mortgage loans to low- and moderate-income borrowers. However, we had no information for small loans to businesses for this performance criteria, and this tempered our overall conclusion.
- Excellent community development lending. The bank has an excellent volume of community development loans and the loans are responsive to identified needs within the assessment area.
- Adequate innovation and flexibility in lending. We lacked sufficient information to fully evaluate the bank's performance under this criterion.

Investment Test

- A good volume of qualified investments. Our view of the volume of investments was tempered by the fact that 57% were made prior to the evaluation period, but the dollar volume of investments is good.
- A moderate level of complexity was noted in the bank's investments, and the investments with some complexity were made prior to the evaluation period.

¹ This rating reflects performance within the multistate metropolitan area. The statewide evaluations do not reflect performance in the parts of those states contained within the multistate metropolitan area.

- The bank's investments are responsive to identified needs. The bulk of the bank's investments supported affordable housing.

Service Test

- An adequate distribution of branches. The percentage of bank branches in both low- and moderate-income areas is somewhat lower than the percentage of the assessment area's population living there. However, we did not note any unreasonable geographic gaps in the bank's branch network.
- An adequate record of opening and closing branches. One-third of the bank's branches in moderate-income areas were closed during the evaluation period, but the distribution of branches in moderate-income areas is still adequate.
- Reasonable business hours and services offered across the bank's branch network.
- Good responsiveness to community development service needs. The volume of service provided is good and it responded to identified needs of the area.

Description of Institution's Operations in Cincinnati MMA

Refer to the Market Profile for the Cincinnati MMA in Appendix C for a detailed description of the assessment areas, the demographics for the combined areas, and other performance context information.

BOO delineates two assessment areas within the Cincinnati MMA. For the purposes of this evaluation, we analyze the assessment areas on a consolidated basis. The bank operates 26 branches in the MMA. In the Ohio portion of the MMA, the bank has a deposit market share of 2%, ranking eighth among banks. In the Kentucky portion of the assessment area, the bank has a deposit market share of 3.5% and ranks seventh among banks.

In determining the weight that the bank's performance in this MMA carried in the overall rating for the bank, we looked at the percentage of the bank's deposits that originate here. The Cincinnati assessment areas are the source of 3.9% of the bank's deposits, and thus the bank's performance there was given modest consideration.

Under the Lending Test, we gave greater consideration to home mortgage lending overall and refinance lending in particular because of the larger number and dollar amount of these loans made by the bank. There were significant volumes of home improvement and small loans to businesses that were considered in the evaluation, but the volume of home purchase lending was modest and this lending activity received less consideration. We did not consider small loans to farms in the bank's evaluation due to the nominal volume of loans.

Refer to the community profile for Cincinnati in Appendix C for information concerning community contacts made during the examination.

LENDING TEST

Overall performance under the Lending Test in the Cincinnati MMA is good.

Lending Activity

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

The overall volume of lending in Cincinnati is excellent. This conclusion results from a good volume of home mortgage lending and excellent volumes of small business and community development lending.

The bank's overall volume of home mortgage lending is good; however, a poor volume of home purchase loans is noted. In this product, the bank's market rank is significantly lower than its deposit market rank. The bank's volume of home improvement loans is excellent with the bank ranking third in the assessment area compared to ranking seventh in deposits. For refinance lending, the bank's market rank exceeded its deposit market rank, and volume is considered excellent.

Small business lending volume is excellent and small farm volume is adequate. Market rank for small business is slightly lower than the deposit rank, while the loan market share exceeds the bank's deposit market share. The small farm rank is slightly lower than the bank's deposit market rank.

There is an excellent volume of community development loans in Cincinnati. The volume represents 5.6% of the amount of Tier 1 capital allocated to this assessment area based upon the percentage of bank deposits originating there. The volume of loans as a percentage of Tier 1 capital helps to gauge the volume of community development lending.

Distribution of Loans by Income Level of Geography

The overall distribution of loans by income level of geography is good in the Cincinnati MMSA. Home mortgage loans reflect excellent overall geographic distribution and small loans to businesses reflect poor distribution.

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

Home Mortgage Loans

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

The geographic distribution of home purchase loans is excellent.

The percentage of loans in both low- and moderate-income tracts exceeds the percentage of owner occupied units in those tracts and is considered excellent. Market share data reflected similar performance with the bank's market share in low-income tracts exceeding the overall market share and reflecting excellent performance. In moderate-income tracts, the bank's market share percentage is somewhat lower than the overall market share percentage and reflects adequate performance.

BOO has a good geographic distribution of home improvement loans.

The percentage of the bank's home improvement loans in low-income tracts exceeds the percentage of owner-occupied units in these areas and is excellent. The market share data indicates similar results. In moderate-income tracts, the percentage of loans is slightly lower than the percentage of owner-occupied units and performance is good. The home improvement market share in moderate-income tracts is somewhat lower than the overall market share and reflects adequate performance. The percentage of owner-occupied units in moderate-income census tracts is significantly higher than the percentage in low-income census tracts and the bank's performance in moderate-income census tracts was given more consideration in developing the conclusion.

The distribution for refinance loans in the Cincinnati MMA is excellent. The percentage of bank loans in both low- and moderate-income areas exceeds the percentage of owner-occupied units in those areas and is excellent. The market share data also reflects excellent performance with the bank's market share for low- and moderate-income census tracts exceeding the bank's overall market share for this product.

Small Business Loans

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

The distribution of small loans to businesses by income level of geography is poor. The percentage of small loans to businesses in both low- and moderate-income areas is significantly lower than the percentage of businesses in those areas and is poor. The market share data is consistent with the percentage distribution indicators as it reflects poor performance in both low- and moderate-income census tracts. The bank's market shares for these areas are significantly lower than the bank's overall market share for this product.

Lending Gap Analysis

There are no unexplained gaps in the assessment area.

Inside/Outside Ratio

The percentage of loans made within the bank's assessment areas is adequate. In developing this conclusion, we considered that a large portion of the lending attributed to BOO originates within the assessment areas of other Bank One charters. The corporation's mortgage company is a subsidiary of the bank and accounts for the majority of the out-of-market home mortgage

lending. There are other similar units within the charter that account for small business, home improvement, and refinance loans outside of BOO's assessment areas, but within affiliate banks' assessment areas. As a result of this structure, only 22% of the bank's home mortgage lending and 49% of small loans to businesses were made inside the bank's assessment areas. We also considered that the bank adequately meets the credit needs of its assessment areas in determining that these percentages were adequate. This calculation was made for the bank as a whole, not for individual assessment areas, and did not include loans made by affiliates.

Distribution of Loans by Income Level of the Borrower

The distribution of loans by income level of borrower is good. The distribution of home mortgage loans is excellent. 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 by borrower income level took into account the percentage of individuals within an assessment area living below the poverty level and the affordability of housing. These variables impacted our expectations regarding the level of home mortgage lending to low-income borrowers.

Home Mortgage Loans

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

Borrower distribution for home purchase loans is excellent in Cincinnati. The percentage of loans to low-income borrowers was somewhat below the percentage of low-income families, but due to the limited borrowing capacity of these households the bank's performance is excellent. The percentage of loans to moderate-income borrowers exceeds the percentage of moderate-income families in the assessment area and is excellent. The bank's market share performance with low- and moderate-income borrowers is consistent with the percentage distribution data for these income categories.

The percentage distribution of home improvement loans by borrower income level is good. The percentage of bank loans to moderate-income borrowers significantly exceeded the percentage of families in that income category and reflected excellent performance. The percentage of loans to low-income borrowers was also excellent when the capacity of the borrowers was taken into account. The market share data was not quite as strong as the percentage distribution data. A good performance for moderate-income borrowers is reflected as the bank's market share is near to the bank's overall market share. Low-income market share performance was somewhat lower than overall market share and is adequate.

The bank's refinance lending reflects excellent borrower

distribution. Performance is good with regards to low-income borrowers due to the borrower capacity issue. The percentage of loans to moderate-income borrowers exceeds the percentage of families in that category and is excellent. Market share performance is excellent for both low- and moderate-income borrowers. The market share for both income categories of borrowers exceeds the bank's overall market share for that product.

Small Business Loans

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

A conclusion was not developed for this aspect of the bank's lending performance. This situation is the result of data integrity issues noted earlier. We did note in all assessment areas that a moderate to high percentage of the bank's small loans to businesses was 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

The bank's community development lending is excellent in Cincinnati.

The volume of community development lending is excellent. We compared the dollar amount of loans to Tier 1 capital to gauge the relative size of community development lending activities. Community development loans represent 5.6% of the Tier 1 capital allocated to this assessment area based on the percentage of BOO's deposits originating here. Ninety-one percent of dollars extended supported affordable housing and the remaining supported the revitalization and/or stabilization of low- and moderate-income areas. During the evaluation period, the bank's community development lending was responsive and helped create or retain 127 affordable housing units. Bank's leadership was noted in the Cincinnati assessment area as exhibited in the following example of community development projects:

Emery Center Apartments

This was a rehabilitation project in Cincinnati's Over-the-Rhine district. The project involved the renovation of a building into 62 rental housing units and subsequent renovation of the historic Emery Theatre. Twenty-five units are specifically targeted for individuals earning less than 60% of the area's median income. This project, located in a low-income area, is part of city-sponsored redevelopment plans in Cincinnati. BOO is one of six banks participating through the Cincinnati Development Fund in the construction and permanent financing (two loans) for the project. Multiple funding sources were noted. Historical tax credits were also involved. Leadership was noted as a bank employee worked closely with the Cincinnati Development Fund in helping to structure the financing.

Product Innovation and Flexibility

BOO's efforts to provide flexible-lending products are

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

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

INVESTMENT TEST

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

The bank's Investment performance is good in the Cincinnati assessment area. This conclusion results from the good volume of investments, the level of complexity noted in the various projects and a good degree of responsiveness to community development needs.

Dollar Amount of Qualified Investments

The volume of qualified investments is good. Investments consisted of 29 prior and 9 current period investments and 44 grants. Of the total dollar volume, a moderate 43% was made during the evaluation period. We used Tier 1 capital to assist us in gauging the volume of investments in Cincinnati. Investments represent 3.5% of the volume of Tier 1 capital allocated to the Cincinnati assessment area based on the percentage of the bank deposits originating there. As noted in Appendix C, there was adequate opportunity for investments in the Cincinnati assessment area and the bank has the capacity to make them.

Innovativeness or Complexity of Qualified Investments

The level of complexity in the bank's investments is moderate and none of the investments are innovative. Six investments reflected complex characteristics; however, none are from the current evaluation period. Complex investments involved various city, state or federal government funding and agencies, and at times, several other parties. An example of a bank investment follows:

Over-the Rhine Area

The bank made two separate investments in projects in the historic Over-the-Rhine area of Cincinnati. The projects involved the conversion of building space into affordable housing units and commercial space. The Franciscan Home project created 35 housing units, all of which were for low- and moderate-income people. The project was complex as there were many sources of funding such as a Community Development Block Grant (CDBG) and City of Cincinnati HOME funds, historic tax credits, rehabilitation tax credits and funding from the Ohio Housing Finance Agency. Banc One Community Development Corporation made an investment in a limited partnership, which developed the project. The investment was made prior to the evaluation period.

The Rhine Link project rehabilitated 17 housing units and two commercial units. The housing units are affordable for individuals with income at or less than 60% of the area's median income. This investment was also an investment in a limited partnership by the bank and was considered moderately complex due to the involvement of city funds and historic tax credits. The bank played a leadership role in the project by providing a construction loan and technical assistance in structuring the

financing package. Technical assistance included helping the general partner file for the historic tax credits and providing legal advice for the project. Again, this is a prior period investment.

Responsiveness of Qualified Investments to Credit and Community Development Needs

The bank's responsiveness to community development needs is good. Investments primarily addressed affordable housing, which was an identified need in Cincinnati. Ninety-three percent of the bank's investments supported affordable housing. Four percent supported the revitalization and/or stabilization of low- and moderate-income areas, 2% supported community services and almost 1% supported economic development. There were 816 affordable housing units created or retained due to bank investments.

SERVICE TEST

Retail Banking Services

Accessibility of Delivery Systems

Branch distribution is adequate in Cincinnati. The distribution of branches is adequate in both low- and moderate-income areas. The percentage of branches located in both low- and moderate-income areas is somewhat less than the percentage of population living in those areas. There are 26 branches serving the Cincinnati assessment area and no unreasonable geographic gaps in the branch network were noted.

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 promoted 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 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 BOO accounts, pay bills, and get information on statements, investments, taxes and insurance.

Changes in Branch Locations

Overall, the bank's performance with regards to changes in branch locations for Cincinnati assessment area is adequate. Branch activity during the evaluation period had neutral impact in low-income areas of the assessment area with no branches opened or closed. The bank closed one branch or 33.3% of branches in moderate-income areas reflecting poor performance. However, as noted above, branch distribution for moderate-income areas is adequate, thus the impact of this branch closure was moderate on the distribution of branches.

Reasonableness of Business Hours and Services in Meeting Assessment Area Needs

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

COMMUNITY DEVELOPMENT SERVICES

The bank's responsiveness to the community development service needs of Cincinnati is good.

Innovativeness and Responsiveness of Community Development Services Provided

BOO's responsiveness to identified needs was good in Cincinnati.

The bank primarily responded to community development service needs of low- and moderate-income individuals and to the need for affordable housing. No services were innovative.

Extent of Community Development Services Provided

The bank provided a good level of community development services to organizations and individuals in Cincinnati. The bank provided services to or in conjunction with 41 organizations. Twenty-four employees provided community development services and all hold leadership positions as a Board or committee member in the organizations they serve. One bank employee in particular was very active in the Cincinnati area by serving on or assisting 20 organizations offering or promoting community development services. Several other employees were active in organizations whose purpose was to create affordable housing for low- and moderate-income people. Bank employees also served on committees of organizations promoting economic growth and the revitalization of downtown Cincinnati. These are just a few examples of community development services.

State Rating

CRA Rating for Ohio²: Satisfactory

The Lending Test is rated:

High Satisfactory

The Investment Test is rated:

Low

Satisfactory

The Service Test is rated:

Low

Satisfactory

The major factors that support this rating include:

Lending Test

- A good volume of lending. We noted a good volume of home mortgage lending. Offsetting a poor volume of home purchase loans, the bank was the second ranked home improvement lender and the top refinance lender in the Columbus assessment area. The bank had good volumes of small loans to businesses.
- An excellent distribution of lending by income level of geography. The distribution of all three home mortgage products was excellent. The distribution of small loans to businesses was good.
- A good distribution of lending by income level of borrower. An excellent distribution of lending for home improvement and refinance lending was offset by an adequate distribution for home purchase loans and lack of information for small loans to businesses.
- Adequate product innovation and flexibility in lending. We lacked information to assess the impact of some of the bank's programs.

Investment Test

- An adequate volume of investments. The dollar volume of investments is modest and we noted that a moderate 51% were made in the current evaluation period.
- A moderate level of complexity in the bank's investments. Only one investment made in the current evaluation period was moderately complex. The complexity resulted from the multiple sources of financing used in the project.
- Adequate responsiveness to community development needs. The bank's investments primarily responded to affordable housing needs.

² 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.

Service Test

- A good distribution of branches. The percentage of bank branches is excellent in low-income areas and good in moderate-income areas when the percentages of bank branches is compared to the percentage of the assessment area's population living in those areas. More weight was given to the moderate-income area percentage due to the greater portion of the population living in those areas.
- An adequate record of opening and closing branches. No branches were opened or closed in low- or moderate-income areas.
- A reasonable distribution of hours and services offered across the branch network. The hours and services are consistent across the branch network.
- Adequate responsiveness to community development service needs. The bank's community development services were limited, but responded to the needs for affordable housing and community development services.

Description of Institution's Operations in Ohio

Refer to the Market Profiles for the State of Ohio in Appendix C for detailed demographics and other performance context information for assessment areas that received full-scope reviews.

BOO delineates sixteen assessment areas in Ohio, excluding the two Cincinnati assessment areas. Ten assessment areas are within or encompass the following MSA's: Akron, Canton-Massillon, Cleveland-Lorain-Elyria, Columbus, Dayton-Springfield, Hamilton-Middletown, Lima, Mansfield, Parkersburg-Marietta and Youngstown-Warren. Six assessment areas are in non-metropolitan areas and include the following: Athens, Portsmouth, Sidney, Ashland, Findley-Marian and Zanesville. The non-metropolitan assessment areas were analyzed on a combined basis for this evaluation.

BOO is the third largest bank in Ohio measured by deposit market share with 9.2% of bank deposits in the state.

Scope of Evaluation in Ohio

We selected the Columbus assessment area for a full scope review. We note that 50.2% of the bank's deposits in this rating area are from Columbus, and the bank's performance there was given primary consideration in developing the ratings for the State of Ohio. The remaining assessment areas in the state were reviewed in a more limited manner.

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

Under the Lending Test, we gave greater consideration to home mortgage lending overall and refinance lending in particular because of the larger number and dollar amount of these loans made by the bank. There were significant volumes of home improvement and small loans to businesses that were considered in the evaluation, but the volume of home purchase lending was modest and this lending activity received less consideration. We did not consider in the evaluation the bank's small loans to farms due to the nominal volume of loans.

During 1999, the OCC conducted outreach meetings with thirteen community-based organizations in the Columbus area in order to determine if credit needs were being met within those areas. These organizations serve communities within the bank's assessment area by helping small business owners prepare business plans, by making small loans to small businesses, implementing community redevelopment plans in conjunction with municipal and state authorities, helping LMI individuals qualify for home mortgages and developing affordable housing. Refer to the community profile for Columbus in Appendix C for information concerning the credit and community development needs and opportunities identified in Columbus.

LENDING TEST

Conclusions for Areas Receiving Full-Scope Reviews

Overall performance under the Lending Test is good in Ohio and good in the Columbus assessment area.

Lending Activity

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

The overall volume of lending in Ohio is good. This is based upon a good volume in Columbus. There were good volumes of home mortgage and small business lending. Small farm loan volume was also good during the evaluation period.

The bank's overall volume of home mortgage lending is good. A poor volume of home purchase loans and excellent volumes of home improvement and refinance loans were noted. For home purchase loans, the bank's market rank was significantly lower than the bank's number one deposit market rank. The bank was the second ranked home improvement lender and the top refinance lender in the market.

Small business and small farm lending volumes are good in Columbus. The market ranks for these products are slightly lower than the bank's deposit market rank.

There is a poor volume of community development loans in Columbus. The dollar volume represents 0.8% of the amount of Tier 1 capital allocated to Columbus based on the percentage of the bank's deposits originating there. Expressing community development loans as a percentage of Tier 1 capital helps to gauge the volume of community development lending.

Distribution of Loans by Income Level of Geography

The overall distribution of loans by income level of geography is excellent in Ohio and excellent in the Columbus assessment area.

Home mortgage reflects excellent geographic distribution and small loans to businesses reflects good geographic distribution.

The reader should note that in developing our conclusions for both geographic and borrower distribution, slightly 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 two-year evaluation period, whereas market share data was only for 1998.

Home Mortgage Loans

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

The geographic distribution of home purchase loans is excellent.

The percentage of loans in both low- and moderate--income census tracts exceeds or substantially meets the corresponding percentages of owner-occupied units and is excellent. Market share data reflects similar performance in both low- and moderate-income tracts. The bank's home purchase market shares in these areas exceed the bank's overall home purchase market share and is excellent.

BOO reflects an excellent geographic distribution of home improvement loans. The distribution in low-income tracts is excellent and exceeds the percentage of owner-occupied units. Low-income market share performance is good and is slightly lower than the overall home improvement market share for the bank. The percentage of loans made in moderate-income tracts exceeds the percentage of owner-occupied units and is considered excellent. Moderate-income market share performance is excellent as well, with the market share in these tracts exceeding the bank's overall market share for this product.

The geographic distribution of the bank's refinance loans is excellent. The percentage of bank loans in both low- and moderate-income areas exceeds the percentage of owner-occupied units in each of those areas. This data reflects excellent distribution. The market share data is consistent with the market share by tract income exceeding the bank's overall refinance market share for both low- and moderate-income tracts.

Small Business Loans

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

The geographic distribution of small loans to businesses is good in the Columbus assessment area. The percentage of small loans to businesses in low-income areas is excellent and exceeds the percentage of businesses in low-income areas. In moderate-income areas, the geographic distribution is adequate being somewhat lower than the percentage of businesses in moderate-income areas.

Market share data reflects similar performance with the bank's market share in low-income tracts exceeding the bank's overall small loans to businesses market share, which is excellent. In moderate-income tracts performance is excellent with moderate-income market share exceeding the overall market share.

Lending Gap Analysis

There were no unexplained gaps in lending in the Columbus assessment area.

Inside/Outside Ratio

This calculation is made for the bank as a whole, as

opposed to on an assessment area basis. Refer to the comment and conclusion under the Cincinnati assessment area for the conclusion that applies here.

Distribution of Loans by Income Level of the Borrower

Overall, the distribution of loans by income level of borrower is good for BOO. 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 by borrower income level took into account the percentage of individuals within an assessment area living below the poverty level and the affordability of housing. These variables impacted our expectations regarding the level of home mortgage lending to low-income borrowers.

Home Mortgage Loans

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

Borrower distribution for home purchase loans is adequate in Columbus. The percentage of loans to low-income borrowers in Columbus is substantially below the percentage of families in this income category and is adequate considering the more limited borrowing capacity of these households. The percentage of loans to moderate-income borrowers is close to the percentage of moderate-income families and is considered good. The market share data reflected a stronger performance with lending to low-income families being excellent. This conclusion is due to the bank's low-income borrower market share exceeding the bank's overall home purchase market share. For moderate-income families, market share performance was adequate with the market share to these families somewhat lower than the overall market share.

The percentage distribution of home improvement loans by borrower income level is excellent. The percentage of bank loans to moderate-income borrowers exceeded the percentage of families in that income category. The percentage of loans to low-income borrowers was excellent when the borrowing capacity was taken into account. The market share data reflected excellent performance for moderate-income borrowers as the bank's market share of loans to those borrowers exceeded the bank's overall market share. The market share data reflected good performance for low-income borrowers with the bank's market share of loans to those borrowers close to the bank's overall home improvement market share.

The bank's refinance lending reflects excellent borrower distribution. Performance is good with regards to low-income borrowers when capacity to borrow is considered, although the percentage of loans to low-income borrowers is substantially lower than the percentage of low-income families. The percentage of loans to moderate-income borrowers exceeds the percentage of

families in that income category and is excellent. Market share reflects excellent performance for both low- and moderate-income borrowers. The bank's market share for both income categories of borrowers exceeds the overall market share for the bank.

Small Business Loans

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

A conclusion was not developed for this aspect of the bank's lending performance. This situation is the result of data integrity issues noted earlier. We did note in all assessment areas that a moderate to high percentage of the bank's small loans to 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

The volume of community development lending in Columbus is modest. We compared the dollar volume of loans to the amount of Tier 1 capital allocated to this assessment area based on the percentage of bank deposits originating there. We used this percentage to gauge the relative size of community development lending activities. Community development loans represent 0.8% of the Tier 1 capital allocated to that assessment area. The only two loans originated in Columbus helped to create or retain 348 affordable housing units. One loan along with its related investment is highlighted under the Investment Test later in this evaluation.

Product Innovation and Flexibility

The comments and conclusions are the same as those made in the corresponding section in the Cincinnati assessment area section of the evaluation.

Conclusions for Areas Receiving Limited Scope Reviews

BOO's performance in the Akron, Canton, Cleveland, Dayton, Lima, and Parkersburg assessment areas is not inconsistent with the bank's overall High Satisfactory Lending Test rating. Performance in the Hamilton and Youngstown assessment areas is inconsistent and weaker due to weaker distribution by income level of geography. Performance in the Mansfield and non-metropolitan assessment areas is inconsistent and weaker due to weaker geographic and borrower distribution performance.

INVESTMENT TEST

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

Conclusions for Areas Receiving Full-Scope Reviews

The bank's investment performance is adequate for the State of Ohio and adequate in the Columbus assessment area. This conclusion resulted from an adequate volume of investments, moderate level of complexity in the various projects and an adequate degree of responsiveness to community development needs.

Dollar Amount of Qualified Investments

The volume of qualified investments was adequate in the Columbus assessment area. Investments consisted of 48 prior and 9 current period investments and 72 grants. Of the total dollar volume of investments, 51% were made during the evaluation period, which is a moderate percentage. We used Tier 1 capital to assist in gauging the volume of investments in Columbus. Investments represent 1.1% of the volume of Tier 1 capital allocated to the Columbus assessment area based on the percentage of deposits originating from that area. As noted in Appendix C, there was adequate opportunity for investments in the Columbus assessment area and the bank has the capacity to make them.

Innovativeness or Complexity of Qualified Investments

The level of complexity in the bank's investments in Columbus was moderate and no investments were innovative. Six investments reflected complex characteristics and one reflected leadership by the bank. However, only one of those investments was made during the evaluation period. Complex investments involved various city, state or federal government funding, and at times, several other parties. The type of funding received, timing of fund distributions and paperwork involved created complex investments. Following is one investment example:

Rosewind

The Rosewind project (a current period investment) involved the construction of 230 housing units consisting of 70 single-family homes and 160 one-to-three bedroom townhomes and apartments. One half of each type of unit is geared for those with incomes less than 60% of the area's median income. These units replaced former public housing units. Other funding involved a Community Building grant from the U. S. Department of Housing and Urban Development, and HOPE VI funds through the City of Columbus. These funds provided for social services such as a tenant assistance program, youth program, job training program, health care, adult education, transportation and day care. BOO provided a construction loan, purchased low-income housing tax credits and also indirectly invested in the project through the state's Ohio Equity Fund VII.

Responsiveness of Qualified Investments to Credit and Community Development Needs

The bank's responsiveness to community development needs was adequate. This was based on adequate responsiveness in the Columbus assessment area. Investments primarily addressing affordable housing needs represented 79% of total investments. Close to 19% of the bank's investments supported community services and 2% supported economic development. A total of 2,116 affordable housing units were created or retained through the bank's investments.

Conclusions for Areas Receiving Limited Scope Reviews

The conclusions for areas receiving limited scope reviews were primarily based on the volume of investments in those areas. Performance in these areas did not change the overall Investment Test rating for the State of Ohio. The bank's performance in the Akron, Canton, Cleveland, Dayton, Lima, Mansfield and non-metropolitan assessment areas was not inconsistent with the overall Low Satisfactory investment performance in Ohio. The volume of investments represented 2.2%, 1.5%, 2.8%, 1.5%, 1.3%, 1.7%, and 2.5% of Tier 1 capital in Akron, Canton, Cleveland, Dayton, Lima, Mansfield and non metropolitan assessment areas, respectively. Performance in Hamilton and Parkersburg was inconsistent and weaker than the bank's overall Low Satisfactory performance in Ohio. The volume of investments was poor and represented .2% and .2% of Tier 1 capital in Hamilton and Parkersburg, respectively. Investment performance in Youngstown was inconsistent and better than the overall adequate performance in Ohio. The volume of investments was good and represented 6.5% of Tier 1 capital.

SERVICE TEST**Conclusions for Areas Receiving Full-Scope Reviews**

The bank's Service Test performance is adequate in the state of Ohio and adequate in the Columbus assessment area.

RETAIL BANKING SERVICES

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

Accessibility of Delivery Systems

Branch distribution is good for Columbus. The distribution of branches by income level of geography is excellent for low-income areas and good in moderate-income areas. The percentage of the bank's branches in low-income areas matches the percentage of the assessment area's population living in low-income tracts. The percentage of branches located in moderate-income areas is close to the percentage of the assessment area's population living in moderate-income tracts. More weight is given to the bank's performance in moderate-income areas as the percentage of population in the moderate-income areas exceeds the population in low-income areas. The bank has 55 branches serving the Columbus assessment area and no unreasonable gaps in the geographic distribution of branches was noted.

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. BOO 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 BOO 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 for the Columbus assessment area is adequate. Branch activity during the evaluation period had neutral impact in low- and moderate-income areas with no branches opening or closing in those areas.

Reasonableness of Business Hours and Services in Meeting Assessment Area Needs

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

Community Development Services

The bank's responsiveness to the community development service needs is adequate in Ohio. This conclusion is based on limited, but adequate performance in the Columbus assessment area.

Innovativeness and Responsiveness of Community Development Services Provided

BOO's responsiveness to identified needs was adequate in the Columbus assessment area. The bank primarily responded to community development service needs of low- and moderate-income people and to the need for affordable housing. No services were innovative.

Extent of Community Development Services Provided

The bank provided an adequate level of community development services to organizations and individuals in Columbus. Nineteen employees contributed community development services to or in conjunction with 20 organizations that address affordable housing, economic development and provide services to low- and moderate-income people. Nineteen employees provided such services and all hold leadership positions as a Board or committee member in the organizations they serve. Employees served on committees working to create affordable housing, addressing neighborhood development, providing gap financing for small businesses and providing various services to low and moderate-income people. Banc One Community Development Corporation and Banc One Capital Markets sponsored a seminar targeted specifically for public housing authorities. The seminar provided information and tools on how to use low-income housing tax credits. These are just a few examples of community development services.

Conclusions for Areas Receiving Limited Scope Reviews

Performance in Akron, Cleveland, Dayton, Lima, Mansfield, and non-metropolitan assessment areas is not inconsistent with overall Low Satisfactory Service Test performance for Ohio.

Performance in Hamilton, Parkersburg, and Youngstown is inconsistent and stronger due to a higher percentage of branches in moderate-income areas.

Performance in Canton is inconsistent and weaker because of poor performance in changes in branches in both low- and moderate-income areas.

Appendix A: Scope of Examination

The following table identifies the time period covered in this evaluation, affiliate activities that were reviewed, and loan products considered. The table also reflects the metropolitan and 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): 01/01/98 to 12/31/99 Investment and Service Tests and CD Loans: 01/01/98 to 03/31/00	
Financial Institution	Products Reviewed	
Bank One, NA (BOO) Columbus, Ohio	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, NA	Bank Affiliate	Small Business, Home Purchase, Home Improvement and Refinance Loans
American NB and Trust Company	Bank Affiliate	Small Business, Home Purchase and Refinance Loans
Bank One Kentucky, NA	Bank Affiliate	Small Business, Home Purchase, Home Improvement and Refinance Loans
Bank One Arizona, NA	Bank Affiliate	Small Business, Home Purchase, Home Improvement and Refinance Loans
Bank One Illinois, NA	Bank Affiliate	Home Purchase and Refinance Loans
NBD Michigan	Bank Affiliate	Small Business, Home Purchase and Refinance Loans
NBD Illinois	Bank Affiliate	Small Business and Home Improvement Loans
Bank One Wisconsin, NA	Bank Affiliate	Small Business, Home Improvement and Refinance Loans
Bank One Indiana, NA	Bank Affiliate	Small Business, Home Improvement and Refinance Loans
Bank One Texas, NA	Bank Affiliate	Home Improvement and Refinance Loans
Bank One Louisiana, NA	Bank Affiliate	Home Improvement Loans and Refinance Loans
Bank One Colorado, NA	Bank Affiliate	Home Improvement Loans
Bank One Financial Services	Subsidiary of Bank One, NA	Home Purchase, Home Improvement and Refinance Loans
First Chicago Mortgage	Holding Company Subsidiary	Home Purchase and Refinance Loans
Bank One Mortgage	Subsidiary of Bank One, NA	Refinance Loans
Bank One Capital Funding	Holding Company Subsidiary	Multifamily Loans
Banc One Community Development Corporation	Holding Company Subsidiary	Community Development Loans and Services, and Investments
Banc One Capital Funding Corporation	Holding Company Subsidiary	Community Development Loans
First Chicago Leasing Corporation	Holding Company Subsidiary	Investments
Banc One Capital Markets	Holding Company Subsidiary	Community Development Services

Appendix A: Scope of Examination Continued

List of Assessment Areas and Type of Examination		
Assessment Area	Type of Exam	Other Information
Columbus	Full Scope	MSA 1840
Cincinnati	Full Scope	MMSA 1640
Akron	Limited Scope	MSA 0080
Canton	Limited Scope	MSA 1320
Cleveland	Limited Scope	MSA 1680
Dayton	Limited Scope	MSA 2000
Hamilton-Middleton	Limited Scope	MSA 3200
Lima	Limited Scope	MSA 4320
Mansfield	Limited Scope	MSA 4800
Parkersburg-Marietta	Limited Scope	MSA 6020
Youngstown	Limited Scope	MSA 9320
Athens, Ohio	Limited Scope	Non-Metropolitan
Portsmouth, Ohio	Limited Scope	Non-Metropolitan
Sidney, Ohio	Limited Scope	Non-Metropolitan
Ashland-Wooster, Ohio	Limited Scope	Non-Metropolitan
Findley-Marion, Ohio	Limited Scope	Non-Metropolitan
Zanesville, Ohio	Limited Scope	Non-Metropolitan

Appendix B: Summary of Multistate Metropolitan Area and State Ratings

RATINGS		Bank One, NA		
Overall Bank:	Lending Test Rating*	Investment Test Rating	Service Test Rating	Overall Bank/State/Multistate Rating
Bank One, NA	High Satisfactory	Low Satisfactory	Low Satisfactory	Satisfactory
Multistate Metropolitan Area or State:				
Cincinnati MMA	High Satisfactory	High Satisfactory	Low Satisfactory	Satisfactory
State of Ohio	High Satisfactory	Low Satisfactory	Low 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

Cincinnati MMA.....	38 - 39
Columbus MSA	40

**Bank One, NA (Ohio)
Cincinnati**

Demographic Information for Full-Scope Area: Cincinnati MMA						
Demographic Characteristics	#	Low % of #	Moderate % of #	Middle % of #	Upper % of #	NA % of #
Geographies (Census Tracts)	317	12.3	19.0	43.2	25.2	0.3
Population by Geography	1,286,418	7.8	15.0	47.9	29.3	0.0
Owner-Occupied Housing by Geography	302,396	2.5	11.4	50.7	35.4	0.0
Businesses by Geography	51,723	7.5	12.4	47.3	32.0	0.8
Farms by Geography	1,136	2.3	7.5	60.2	29.8	.2
Family Distribution by Income Level	336,869	19.9	17.0	23.4	39.7	0.0
Distribution of Low- and Moderate-Income Families throughout AA Geographies	124,447	15.0	22.0	48.0	15.0	0.0
Median Family Income HUD Adjusted Median Family Income for 1999 Households Below the Poverty Level	= \$36,658 = \$54,800 = 12.40%	Median Housing Value Unemployment Rate November 30, 1999			= \$73,433 = 2.62%	

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

The Cincinnati MSA is a multi-state metropolitan area (MMA) consisting of four counties in Ohio (Brown, Clarendon, Hamilton, and Warren) and six counties in Kentucky (Boone, Campbell, Gallatin, Grant, Kenton, and Pendleton). The Cincinnati MMA is located in the southwest portion of Ohio and the north east portion of Kentucky. The bank has designated two assessment areas in the Cincinnati MMA. The first assessment area includes part of Warren County in Ohio. The second assessment area consists of portions of Clermont and Hamilton counties in Ohio and portions of Boone, Campbell, and Kenton Counties in Kentucky. For analysis purposes, the bank's two assessment areas within the Cincinnati MMA will be analyzed on a consolidated basis.

In the Kentucky portion of the Cincinnati MMA, BOO ranks seventh with a 3.5% deposit market share. Fifth Third Bank of Northern Kentucky, Inc. ranks first with a 21.3% deposit market share. In the Ohio portion of the Cincinnati MMA, BOO ranks eighth with a 2% deposit market share. Fifth Third Bank ranks first with 22.2% deposit market share.

In order to identify credit needs, the OCC conducted community outreach meetings in the Cincinnati area during February of 1999. Ten organizations from the Cincinnati area attended these meetings, during which, a number of credit needs were identified by the community groups. Affordable housing is a significant need that includes affordable single family houses, flexible home mortgage products, down-payment assistance programs, and affordable rental housing. Also identified was the need for lower-cost financial services for low- and moderate-income

individuals and banking facilities with convenient hours in low-and moderate-income areas of the community. Also, financial services education for low-and moderate-income individuals is needed. Small business credit needs include venture capital for small business, working capital loan programs, and increased use of SBA loan programs by bankers. Currently there is a micro-loan program administered by BOO, however, there is a need for more programs of this type.

There are numerous organizations focusing on affordable housing and support for low-and moderate-income individuals in the Cincinnati MMA. Investment opportunities consist of tax credits, mortgage-backed security pools and several small business investment corporations. Overall there are adequate community development lending, investment and service opportunities for banks to participate in.

Bank One, NA (Ohio)
Columbus Assessment Area

Demographic Information for Full-Scope Area: Columbus MSA, 1840						
Demographic Characteristics	#	Low % of #	Moderate % of #	Middle % of #	Upper % of #	NA % of #
Geographies (Census Tracts)	334	10.8	24.5	42.8	21.0	0.9
Population by Geography	1,319,007	9.2	20.3	42.5	28.0	0.0
Owner-Occupied Housing by Geography	301,144	3.8	16.5	46.5	33.2	0.0
Businesses by Geography	51,163	8.4	17.0	39.5	33.0	2.1
Farms by Geography	2,087	1.3	8.0	65.6	25.0	0.1
Family Distribution by Income Level	342,658	19.1	17.9	24.6	38.4	0.0
Distribution of Low- and Moderate-Income Families throughout AA Geographies	126,836	14.0	30.0	44.0	12.0	0.0
Median Family Income HUD Adjusted Median Family Income for 1999 Households Below the Poverty Level	= \$36,729 = \$53,800 = 11.57%	Median Housing Value Unemployment Rate November 30, 1999			= \$74,095 = 2.76%	

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

The Columbus MSA consists of Delaware, Fairfield, Franklin, Licking, Madison, and Pickaway counties and is located in the central part of Ohio. The bank's assessment area consists of the entire MSA and no changes were made to this assessment area during the evaluation period. In terms of deposit market share, BOO is the largest bank in the MSA with a market share of 36.4% according to the June 30, 1999 FDIC Deposit Market Share Reports. Huntington NB rank's second with 15.5% deposit market share.

In order to identify credit needs, the OCC conducted community outreach meetings in the Columbus area during 1999. Thirteen community-based organizations from the Columbus area attended these meetings, during which a number of credit needs were identified by the attending community groups. Affordable housing is a significant need and this includes financing for the purchase of affordable single family houses, flexible home mortgage products, and affordable rental housing rehab funding. Additional identified needs are lower-cost financial services for low- and moderate-income individuals, along with a need for banking facilities in low- and moderate-income areas of the community.

Small business credit needs include larger dollar amount micro business loans, increased use of SBA loan programs by banks, technical assistance for small businesses, and referrals of small business owners to agencies that could help them when they do not qualify for bank financing. There are numerous organizations within the Columbus assessment area focusing on affordable housing and support for low- and moderate-income individuals.

Investment opportunities consist of tax credits, mortgage-backed security pools and a small business investment corporation. Overall there are adequate community development lending, investment and service opportunities for banks to participate in.

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 Examination). For purposes of reviewing the Lending Test tables, the following are applicable: purchased loans are treated as originations/purchases; market rank is based on the number of loans originated and purchased by the bank as compared to all other lenders in the MSA/assessment area; and market share is the number of loans originated and purchased by the bank as a percentage of the aggregate number of reportable loans originated and purchased by all lenders in the MSA/assessment area.

The following is a listing and brief description of the tables:

Table 1. Lending Volume - Presents the number and dollar amount of reportable loans originated and purchased by the bank over the evaluation period by MSA/assessment area.

Table 2. Geographic Distribution of Home Purchase Loans - Compares the percentage distribution of the number of loans originated and purchased by the bank in low-, moderate-, middle- and upper-income geographies to the percentage distribution of owner-occupied housing units throughout those geographies. The table also presents market rank and market share information based on the most recent aggregate market data available.

Table 3. Geographic Distribution of Home Improvement Loans - See Table 2.

Table 4. Geographic Distribution of Refinance Loans - See Table 2.

Table 5. Geographic Distribution of Small Loans to Businesses - The percentage distribution of the number of small loans (less than or equal to \$1 million) to businesses originated and purchased by the bank in low-, moderate-, middle- and upper-income geographies compared to the percentage distribution of businesses (regardless of revenue size) throughout those geographies. The table also presents market rank and market share information based on the most recent aggregate market data available.

Table 6. Geographic Distribution of Small Loans to Farms - The percentage distribution of the number of small loans (less than or equal to \$500,000) to farms originated and purchased by the bank in low-, moderate-, middle- and upper-income geographies compared to the percentage distribution of farms (regardless of revenue size) throughout those geographies. The table also presents market rank and market share information based on the most recent aggregate market data available.

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

Table 13. Distribution of Branch Delivery System and Branch Openings/Closings - Compares the percentage distribution of the number of the bank's branches in low-, moderate-, middle- and upper-income geographies to the percentage of the population within each geography in each MSA/AA. The table also presents data on branch openings and closings in each MSA/AA.

Table 1a. Lending Volume - Cincinnati MMA

LENDING VOLUME											Evaluation	
Period: 01/01/1998 TO 12/31/1999												
MSA/Assessment Area	% of Rating Area Deposits in AA*	Home Mortgage		Small Business		Small Farm		Community Development		Total Reported Loans		% of Rating Area Loans in AA (% of #)
		#	\$ (000's)	#	\$ (000's)	#	\$ (000's)	#	\$ (000's)	#	\$(000's)	
Full Scope												
Cincinnati, OH	100.0	7,100	337,85 ₁	1,332	129,44 ₉	2	114	4	4,968	8,438	472,38 ₂	100.0

Table 1b. Lending Volume - State of Ohio

LENDING VOLUME											Evaluation	
Period: 01/01/1998 TO 12/31/1999												
MSA/Assessment Area	% of Rating Area Deposits in AA*	Home Mortgage		Small Business		Small Farm		Community Development		Total Reported Loans		% of Rating Area Loans in AA (% of #)
		#	\$ (000's)	#	\$ (000's)	#	\$ (000's)	#	\$ (000's)	#	\$(000's)	
Full Scope												
Columbus, OH	50.2	10,196	592,19 ₁	2,575	240,40 ₂	53	5,463	2	8,805	12,826	846,86 ₁	22.3
Limited Scope												

* Deposit Data as of June 30, 1999

LENDING VOLUME												Evaluation
Period: 01/01/1998 TO 12/31/1999												
Akron, OH	6.2	3,813	187,822	994	103,977	1	70	0	0	4,808	291,869	8.4
Canton-Massillon, OH	3.7	2,605	122,074	600	63,402	1	20	0	0	3,206	185,496	5.6
Cleveland, OH	10.1	9,148	465,958	2,293	246,102	5	205	1	2,033	11,447	714,298	19.9
Dayton, OH	10.6	5,858	285,059	1,317	116,148	4	894	6	4,528	7,185	406,629	12.5
Hamilton-Middletown	1.2	2,366	112,252	242	27,076	1	29	1	2,200	2,610	141,557	4.5
Lima, OH	2.2	1,705	93,597	414	33,782	20	1,461	0	0	2,139	128,840	3.7
Mansfield, OH	1.2	674	35,613	210	26,298	0	0	0	0	884	61,911	1.5
Non-Metro Ohio	8.2	5,406	336,530	1,622	123,132	62	4,773	3	2,734	7,093	467,169	12.4
Parkersburg, OH	1.0	439	25,328	220	23,471	2	130	0	0	661	48,929	1.2
Youngstown, OH	5.4	3,552	160,774	1,019	102,870	10	1,009	1	200	4,582	264,853	8.0

Table 2a. Geographic Distribution of Home Purchase Loans - Cincinnati MMA

Geographic Distribution: HOME PURCHASE Period: 01/01/1998 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																
Cincinnati, OH	2.5	4.2	11.4	14.3	50.7	56.5	35.4	25.0	62	0.4	0.5	0.3	0.5	0.2	356	100.0

Table 2b. Geographic Distribution of Home Purchase Loans - State of Ohio

Geographic Distribution: HOME PURCHASE Period: 01/01/1998 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																
Columbus, OH	3.8	6.4	16.5	15.9	46.5	36.1	33.2	41.6	29	0.9	2.0	1.3	0.8	0.9	1,022	23.6
Limited Scope																
Akron, OH	3.1	5.5	14.1	17.6	58.6	60.4	24.1	16.5	52	0.5	1.7	0.7	0.4	0.4	255	5.9
Canton-Massillon, OH	2.1	0.6	13.7	26.7	61.3	59.7	23.0	13.1	28	1.0	0.0	1.8	1.0	0.7	176	4.1
Cleveland, OH	5.0	11.3	10.4	18.9	51.8	46.1	32.9	23.8	52	0.4	0.9	0.7	0.4	0.3	560	12.9
Dayton, OH	3.9	6.3	14.7	16.3	47.9	48.2	33.5	29.2	27	0.9	1.2	0.9	1.0	0.8	411	9.5
Hamilton-Middletown, OH	3.5	4.8	18.2	21.0	49.5	50.0	28.8	24.2	52	0.4	0.6	0.6	0.5	0.3	124	2.9
Lima, OH	3.0	1.4	9.7	10.7	72.7	64.6	14.5	23.2	4	6.3	4.8	6.5	6.0	7.2	280	6.5
Mansfield, OH	2.3	2.8	18.2	9.9	46.1	46.5	33.4	40.8	12	1.9	0.0	1.0	1.5	2.8	71	1.6
Non-Metro Ohio	0.7	0.4	16.2	9.7	63.7	57.7	19.4	32.1	4						906	20.9

* Based on 1998 Aggregate HMDA Data Only. Market rank is for all income categories combined.
 ** Home purchase loans within an MSA/AA as a % of all home purchase loans in the rating area.

										4.2	3.9	3.3	3.8	5.5		
Parkersburg, OH	0.0	0.0	16.5	16.0	73.0	67.0	10.6	17.0	3	7.5	0.0	7.3	6.7	14.0	100	2.3
Youngstown, OH	3.6	2.6	12.9	11.1	56.1	55.5	27.4	30.8	10	2.4	6.1	3.0	2.4	2.0	425	9.8

Table 3a. Geographic Distribution of Home Improvement Loans - Cincinnati MMA

Geographic Distribution: HOME IMPROVEMENT Period: 01/01/1998 TO 12/31/1999															Evaluation	
MSA/Assessment Area	Low Income Geographies		Moderate Income Geographies		Middle Income Geographies		Upper Income Geographies		Overall Market Rank*	Market Share by Geography					Total Home Improvement Loans	
	% Owner Occ Units	% Bank Loans	% Owner Occ Units	% Bank Loans	% Owner Occ Units	% Bank Loans	% Owner Occ Units	% Bank Loans		Over all	Low	Mod	Mid	Upp	#	% of Total **
Full Scope																
Cincinnati, OH	2.5	3.2	11.4	10.6	50.7	57.3	35.4	28.9	3	11.6	13.6	9.4	12.2	11.3	1,523	100.0

Table 3b Geographic Distribution of Home Improvement Loans - State of Ohio

Geographic Distribution: HOME IMPROVEMENT Period: 01/01/1998 TO 12/31/1999															Evaluation	
MSA/Assessment Area	Low Income Geographies		Moderate Income Geographies		Middle Income Geographies		Upper Income Geographies		Overall Market Rank*	Market Share by Geography					Total Home Improvement Loans	
	% Owner Occ Units	% Bank Loans	% Owner Occ Units	% Bank Loans	% Owner Occ Units	% Bank Loans	% Owner Occ Units	% Bank Loans		Over all	Low	Mod	Mid	Upp	#	% of Total **
Full Scope																
Columbus, OH	3.8	3.9	16.5	18.6	46.5	48.7	33.2	28.8	2	14.1	13.1	14.4	14.2	13.8	1,702	21.4
Limited Scope																
Akron, OH	3.1	4.4	14.1	20.9	58.6	62.7	24.1	12.0	4	12.0	10.5	12.3	13.2	7.4	660	8.3
Canton-Massillon, OH	2.1	3.2	13.7	20.5	61.3	63.5	23.0	12.9	1	17.1	11.8	16.0	19.2	11.9	474	6.0
Cleveland, OH	5.0	8.8	10.4	17.0	51.8	55.1	32.9	19.1	3	13.3	10.6	13.2	14.8	11.3	1,963	24.7
Dayton, OH	3.9	5.5	14.7	16.4	47.9	52.9	33.5	25.3	2	15.0	17.0	14.8	16.5	12.0	1,278	16.1

* Based on 1998 Aggregate HMDA Data Only. Market rank is for all income categories combined.
 ** Home improvement loans within an MSA/AA as a % of all home improvement loans in the rating area.

Hamilton-Middletown, OH	3.5	5.6	18.2	22.2	49.5	44.4	28.8	27.8	3	14.1	12.8	14.0	13.6	15.1	504	6.4
Lima, OH	3.0	1.4	9.7	11.7	72.7	74.2	14.5	12.7	2	17.0	9.5	17.6	17.3	16.7	213	2.7
Mansfield, OH	2.3	4.1	18.2	32.0	46.1	38.1	33.4	25.8	3	15.6	18.2	21.3	13.2	14.6	97	1.2
Non-Metro Ohio	0.7	0.4	16.2	11.0	63.7	63.7	19.4	24.8	5	7.2	0.0	4.3	7.0	10.0	499	6.3
Parkersburg, OH	0.0	0.0	16.5	15.6	73.0	62.5	10.6	21.9	4	7.4	0.0	10.0	5.8	18.2	32	0.4
Youngstown, OH	3.6	5.8	12.9	13.5	56.1	54.5	27.4	26.2	2	10.1	21.7	11.6	9.5	9.2	519	6.5

Table 4a. Geographic Distribution of Home Mortgage Refinance Loans - Cincinnati MMA

Geographic Distribution: HOME MORTGAGE REFINANCE															Evaluation	
Period: 01/01/1998 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																
Cincinnati, OH	2.5	3.1	11.4	12.0	50.7	59.4	35.4	25.6	6	3.7	5.0	4.6	4.6	2.4	5,220	100.0

Table 4b. Geographic Distribution of Home Mortgage Refinance Loans - State of Ohio

Geographic Distribution: HOME MORTGAGE REFINANCE															Evaluation	
Period: 01/01/1998 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																
Columbus, OH	3.8	4.3	16.5	17.0	46.5	49.1	33.2	29.5	1	5.2	6.1	6.6	6.0	4.0	7,467	22.3
Limited Scope																

* 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.

Akron, OH	3.1	3.8	14.1	19.3	58.6	61.2	24.1	15.7	4	4.5	3.3	6.6	4.9	2.9	2,898	8.7
Canton-Massillon, OH	2.1	2.7	13.7	20.7	61.3	60.7	23.0	15.9	2	5.8	5.3	7.6	6.3	3.9	1,951	5.8
Cleveland, OH	5.0	7.4	10.4	15.4	51.8	55.7	32.9	21.5	5	3.8	3.9	5.1	4.4	2.6	6,622	19.8
Dayton, OH	3.9	6.3	14.7	16.5	47.9	51.7	33.5	25.5	3	6.2	11.5	7.6	7.1	4.3	4,166	12.5
Hamilton-Middletown, OH	3.5	6.4	18.2	21.7	49.5	47.0	28.8	24.9	4	4.6	11.2	6.8	4.6	3.5	1,738	5.2
Lima, OH	3.0	4.0	9.7	8.2	72.7	69.0	14.5	18.9	2	11.5	15.3	8.8	11.4	12.3	1,211	3.6
Mansfield, OH	2.3	4.2	18.2	21.1	46.1	40.1	33.4	34.6	3	8.4	12.7	8.4	7.3	9.5	506	1.5
Non-Metro Ohio	0.7	0.7	16.2	11.2	63.7	63.2	19.4	24.8	1	8.5	2.5	7.0	8.2	9.8	3,999	12.0
Parkersburg, OH	0.0	0.0	16.5	18.6	73.0	66.4	10.6	15.0	4	9.2	0.0	9.7	8.3	16.1	307	0.9
Youngstown, OH	3.6	2.6	12.9	11.4	56.1	56.4	27.4	29.6	4	5.5	7.8	6.1	5.1	6.0	2,608	7.8

Table 5a. Geographic Distribution of Small Loans to Businesses - Cincinnati MMA

Geographic Distribution: SMALL BUSINESS Period: 01/01/1998 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 Small Business Loans	
	% of Businesses	% Bank Loans	% of Businesses	% Bank Loans	% of Businesses	% Bank Loans	% of Businesses	% Bank Loans		Overall	Low	Mod	Mid	Upp	#	% of Total**
Full Scope																
Cincinnati, OH	7.5	1.8	12.4	5.1	47.3	70.4	32.0	22.5	9	4.6	1.8	2.0	6.5	3.5	1,332	100.0

Table 5b. Geographic Distribution of Small Loans to Businesses - State of Ohio

Geographic Distribution: SMALL BUSINESS Period: 01/01/1998 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 Small Business Loans	
	% of Businesses	% Bank Loans	% of Businesses	% Bank Loans	% of Businesses	% Bank Loans	% of Businesses	% Bank Loans		Overall	Low	Mod	Mid	Upp	#	% of Total**
Full Scope																
Columbus, OH	8.4	9.1	17.0	14.3	39.5	38.5	33.0	37.1	5	10.4	11.6	11.2	10.4	10.1	2,575	22.4
Limited Scope																
Akron, OH	7.0	8.2	14.3	11.2	50.2	53.5	28.5	27.1	5	7.6	10.2	8.0	8.4	5.7	994	8.6
Canton-Massillon, OH	7.6	7.0	11.9	9.5	54.5	53.5	26.1	30.0	5	8.7	8.6	7.4	9.4	8.2	600	5.2
Cleveland, OH	8.9	7.9	9.6	8.2	43.8	48.1	34.4	33.8	6	6.8	7.0	6.8	7.9	5.7	2,293	19.9
Dayton, OH	9.4	9.3	18.5	22.9	41.5	34.6	30.6	33.2	5	11.2	11.4	11.7	11.3	10.8	1,317	11.5
Hamilton-Middletown, OH	8.8	5.4	16.4	19.4	47.6	51.2	27.2	24.0	6	5.4	6.0	11.0	4.9	4.1	242	2.1
Lima, OH	11.6	15.5	10.5	12.6	64.1	53.1	13.9	18.8	2	23.3	39.6	26.8	20.7	19.6	414	3.6
Mansfield, OH	9.4	2.9	21.5	17.6	46.6	46.7	22.5	32.9	3	11.3	3.8	10.1	10.6	15.8	210	1.8

* 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.

Non-Metro Ohio	3.9	1.2	16.5	12.1	62.3	67.3	17.2	19.4	1	13.1	9.3	11.8	14.1	10.9	1,622	14.1
Parkersburg, OH	0.0	0.0	21.1	26.4	60.7	42.7	18.2	30.9	2	20.0	0.0	27.9	10.9	31.5	220	1.9
Youngstown, OH	7.9	4.6	13.0	11.5	48.6	50.6	30.3	32.6	3	10.6	7.3	14.5	10.8	9.7	1,019	8.9

Table 6a. Geographic Distribution of Small Loans to Farms - Cincinnati MMA

Geographic Distribution: SMALL FARM Period: 01/01/1998 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 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																
Cincinnati, OH	2.3	50.0	7.5	0.0	60.2	0.0	29.8	50.0	11	1.7	33.3	0.0	0.0	0.0	2	100.0

Table 6b. Geographic Distribution of Small Loans to Farms - State of Ohio

Geographic Distribution: SMALL FARM Period: 01/01/1998 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 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																
Columbus, OH	1.3	0.0	8.0	9.4	65.6	56.6	25.0	34.0	4	10.5	0.0	17.6	7.2	21.2	53	33.3
Limited Scope																
Akron, OH	2.0	0.0	4.4	0.0	63.8	100.0	29.8	0.0	5	5.6	0.0	0.0	5.9	0.0	1	0.6
Canton-Massillon, OH	0.4	0.0	2.8	0.0	81.9	100.0	14.9	0.0	5	11.1	0.0	0.0	14.3	0.0	1	0.6
Cleveland, OH	0.8	0.0	3.5	20.0	52.3	40.0	43.2	40.0	4	8.3	0.0	0.0	8.7	8.3	5	3.2
Dayton, OH	1.1	25.0	12.9	0.0	53.0	25.0	33.0	50.0	--	0.0	0.0	0.0	0.0	0.0	4	2.5
Hamilton-Middletown, OH	2.3	0.0	4.8	0.0	67.2	0.0	25.1	100.0	--	0.0	0.0	0.0	0.0	0.0	1	0.6
Lima, OH	0.3	0.0	1.5	0.0	93.0	95.0	5.1	5.0	4	9.7	0.0	0.0	9.0	50.0	20	12.6
Mansfield, OH	1.3	0.0	14.3	0.0	27.3	0.0	57.1	0.0	--	0.0	0.0	0.0	0.0	0.0	0	0.0
Non-Metro Ohio	0.1	0.0	7.4	4.8	69.4	64.5	23.0	30.6	8	4.7	0.0	5.6	4.2	6.0	62	39.0

* 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.

Parkersburg, OH	0.0	0.0	10.9	50.0	82.4	50.0	6.8	0.0	2	28.6	0.0	100. 0	16.7	0.0	2	1.3
Youngstown, OH	0.6	0.0	3.8	0.0	68.3	90.0	27.0	10.0	1	22.7	0.0	0.0	33.3	0.0	10	6.3

Table 7a. Borrower Distribution of Home Purchase Loans - Cincinnati MMA

Borrower Distribution: HMDA HOME PURCHASE															Evaluation	
Period: 01/01/1998 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																
Cincinnati, OH	19.9	13.2	17.0	21.9	23.4	14.6	39.7	21.1	62	0.4	0.7	0.5	0.2	0.3	356	100.0

Table 7b. Borrower Distribution of Home Purchase Loans - State of Ohio

Borrower Distribution: HMDA HOME PURCHASE															Evaluation	
Period: 01/01/1998 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																
Columbus, OH	19.1	7.3	17.9	16.3	24.6	17.8	38.4	25.8	29	0.9	1.2	0.7	0.6	0.9	1,022	23.6
Limited Scope																
Akron, OH	19.2	10.6	18.4	22.0	23.9	20.4	38.6	24.7	52	0.5	0.7	0.7	0.4	0.4	255	5.9
Canton-Massillon, OH	17.8	8.0	18.1	21.6	25.1	22.7	39.0	27.8	28	1.0	1.4	0.9	0.9	1.1	176	4.1
Cleveland, OH	19.7	8.4	17.0	15.4	24.0	13.9	39.3	22.1	52	0.4	0.5	0.4	0.3	0.4	560	12.9
Dayton, OH	19.2	10.2	17.5	18.0	23.9	17.3	39.4	25.1	27	0.9	1.1	0.8	0.6	1.0	411	9.5
Hamilton-Middletown, OH	19.2	5.6	18.2	16.9	24.5	19.4	38.1	28.2	52	0.4	0.2	0.4	0.4	0.6	124	2.9
Lima, OH	19.2	8.9	19.0	20.7	23.7	30.7	38.1	29.6	4	6.3	4.8	5.1	8.2	6.3	280	6.5
Mansfield, OH	19.6	1.4	17.9	16.9	24.0	26.8	38.4	38.0	12	1.9	0.0	0.7	2.7	2.5	71	1.6
Non-Metro Ohio	19.0	6.4	18.2	21.5	24.1	26.5	38.7	39.0	4						906	20.9

* 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.

										4.2	3.5	4.1	4.5	5.7		
Parkersburg, OH	20.8	8.0	18.7	27.0	22.2	27.0	38.3	34.0	3	7.5	5.1	10.3	9.0	6.4	100	2.3
Youngstown, OH	19.8	13.2	18.4	25.2	22.7	26.1	39.1	26.4	10	2.4	3.9	2.9	2.3	2.1	425	9.8

Table 8a. Borrower Distribution of Home Improvement Loans - Cincinnati MMA

Borrower Distribution: HOME IMPROVEMENT																Evaluation	
Period: 01/01/1998 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																	
Cincinnati, OH	19.9	10.4	17.0	23.6	23.4	34.5	39.7	30.9	3	11.6	8.8	10.5	14.2	11.9	1,523	100.0	

Table 8b. Borrower Distribution of Home Improvement Loans - State of Ohio

Borrower Distribution: HOME IMPROVEMENT																Evaluation	
Period: 01/01/1998 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																	
Columbus, OH	19.1	10.9	17.9	23.0	24.6	29.1	38.4	33.2	2	14.1	12.9	14.8	14.7	13.7	1,702	21.4	
Limited Scope																	
Akron, OH	19.2	14.1	18.4	27.4	23.9	26.5	38.6	30.2	4	12.0	11.1	13.6	10.6	12.6	660	8.3	
Canton-Massillon, OH	17.8	17.0	18.1	27.0	25.1	28.5	39.0	25.5	1	17.1	21.7	17.7	16.1	16.4	474	6.0	
Cleveland, OH	19.7	14.0	17.0	27.2	24.0	30.1	39.3	27.2	3	13.3	10.8	14.7	14.6	12.8	1,963	24.7	
Dayton, OH	19.2	12.8	17.5	23.2	23.9	34.0	39.4	28.9	2	15.0	14.6	15.8	17.0	13.6	1,278	16.1	

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

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

Hamilton-Middletown, OH	19.2	12.3	18.2	24.2	24.5	28.0	38.1	35.3	3	14.1	11.3	13.9	13.9	16.7	504	6.4
Lima, OH	19.2	11.7	19.0	22.1	23.7	31.9	38.1	32.9	2	17.0	20.0	14.5	18.8	16.4	213	2.7
Mansfield, OH	19.6	12.4	17.9	25.8	24.0	28.9	38.4	32.0	3	15.6	17.5	15.9	15.1	16.2	97	1.2
Non-Metro Ohio	19.0	6.8	18.2	23.8	24.1	31.3	38.7	36.5	5	7.2	5.1	7.0	7.7	7.7	499	6.3
Parkersburg, OH	20.8	9.4	18.7	28.1	22.2	25.0	38.3	37.5	4	7.4	6.7	11.4	6.5	5.9	32	0.4
Youngstown, OH	19.8	11.6	18.4	23.3	22.7	32.2	39.1	32.2	2	10.1	11.1	11.6	11.9	8.3	519	6.5

Table 9a. Borrower Distribution of Home Mortgage Refinance Loans - Cincinnati MMA

Borrower Distribution: HOME MORTGAGE REFINANCE															Evaluation	
Period: 01/01/1998 TO 12/31/1999																
MSA/Assessment Area	Low Income Families		Moderate Income Families		Middle Income Families		Upper Income Families		Overall Market Rank*	Market Share by Borrower Income*					Total Loans	
	% of Families	% Bank Loans **	% of Families	% Bank Loans **	% of Families	% Bank Loans **	% of Families	% Bank Loans **		Overall	Low	Mod	Mid	Upp	#	% of Total
Full Scope																
Cincinnati, OH	19.9	9.4	17.0	23.6	23.4	30.5	39.7	25.6	6	3.7	4.9	5.0	4.9	2.7	5,220	100.0

Table 9b. Borrower Distribution of Home Mortgage Refinance Loans - State of Ohio

Borrower Distribution: HOME MORTGAGE REFINANCE															Evaluation	
Period: 01/01/1998 TO 12/31/1999																
MSA/Assessment Area	Low Income Families		Moderate Income Families		Middle Income Families		Upper Income Families		Overall Market Rank*	Market Share by Borrower Income*					Total Loans	
	% of Families	% Bank Loans **	% of Families	% Bank Loans **	% of Families	% Bank Loans **	% of Families	% Bank Loans **		Overall	Low	Mod	Mid	Upp	#	% of Total
Full Scope																
Columbus, OH	19.1	8.0	17.9	20.6	24.6	26.1	38.4	31.5	1	5.2	6.1	6.7	6.5	5.1	7,467	22.3
Limited Scope																
Akron, OH	19.2	7.7	18.4	21.6	23.9	27.9	38.6	30.7	4	4.5	4.0	5.2	5.3	4.3	2,898	8.7
Canton-Massillon, OH	17.8	10.5	18.1	22.2	25.1	30.7	39.0	26.3	2	5.8	5.3	7.1	7.2	5.4	1,951	5.8
Cleveland, OH	19.7	9.5	17.0	22.1	24.0	27.4	39.3	25.7	5	3.8	3.6	4.5	4.5	3.4	6,622	19.8
Dayton, OH	19.2	10.8	17.5	22.6	23.9	28.1	39.4	28.2	3	6.2	7.2	8.3	8.0	5.9	4,166	12.5
Hamilton-Middletown, OH	19.2	8.6	18.2	24.3	24.5	28.1	38.1	29.3	4	4.6	5.2	6.3	5.4	4.1	1,738	5.2
Lima, OH	19.2	6.5	19.0	20.6	23.7	30.7	38.1	34.8	2	11.5	10.8	11.3	12.8	11.6	1,211	3.6
Mansfield, OH	19.6	10.9	17.9	21.5	24.0	24.3	38.4	33.6	3	8.4	10.6	7.6	8.7	9.0	506	1.5
Non-Metro Ohio	19.0	5.6	18.2	18.6	24.1	28.0	38.7	39.9	1	8.5	6.1	8.7	9.7	10.2	3,999	12.0

* 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.

Parkersburg, OH	20.8	4.6	18.7	20.8	22.2	29.3	38.3	39.7	4						307	0.9
Youngstown, OH	19.8	6.9	18.4	18.1	22.7	26.3	39.1	40.8	4	9.2	4.8	10.7	11.8	9.2	2,608	7.8

Table 10a. Borrower Distribution of Small Loans to Businesses - Cincinnati MMA

Borrower Distribution: SMALL BUSINESS										Evaluation	
Period: 01/01/1998 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											
Cincinnati, OH	--	--	--	76.0	13.7	10.3	4.6	--	1,332	100.0	

Table 10b. Borrower Distribution of Small Loans to Businesses - State of Ohio

Borrower Distribution: SMALL BUSINESS										Evaluation	
Period: 01/01/1998 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											
Columbus, OH	--	--	--	80.2	11.4	8.5	10.4	--	2,575	22.4	
Limited Scope											
Akron, OH	--	--	--	76.1	12.7	11.3	7.6	--	994	8.6	
Canton-Massillon, OH	--	--	--	76.3	12.7	11.0	8.7	--	600	5.2	
Cleveland, OH	--	--	--	75.0	13.8	11.2	6.8	--	2,293	19.9	
Dayton, OH	--	--	--	80.0	11.9	8.1	11.2	--	1,317	11.5	
Hamilton-Middletown, OH	--	--	--	76.4	10.7	12.8	5.4	--	242	2.1	
Lima, OH	--	--	--	77.8	14.3	8.0	23.3	--	414	3.6	
Mansfield, OH	--	--	--	71.9	15.2	12.9	11.3	--	210	1.8	
Non-Metro Ohio	--	--	--	82.2	11.1	6.7	13.1	--	1,622	14.1	
Parkersburg, OH	--	--	--	69.1	19.1	11.8	20.0	--	220	1.9	

* The market consists of all other Small Business reporters in Bank One 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.

Youngstown, OH	--	--	--	76.3	14.3	9.3	10.6	--	1,019	8.9
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Table 11a. Borrower Distribution of Small Loans to Farms - Cincinnati MMA

Borrower Distribution: SMALL FARM										Evaluation	
Period: 01/01/1998 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											
Cincinnati, OH	--	--	--	100.0	0.0	0.0	1.7	--	2	100.0	

Table 11b. Borrower Distribution of Small Loans to Farms - State of Ohio

Borrower Distribution: SMALL FARM										Evaluation	
Period: 01/01/1998 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											
Columbus, OH	--	--	--	69.8	24.5	5.7	10.5	--	53	33.3	
Limited Scope											
Akron, OH	--	--	--	100.0	0.0	0.0	5.6	--	1	0.6	
Canton-Massillon, OH	--	--	--	100.0	0.0	0.0	11.1	--	1	0.6	
Cleveland, OH	--	--	--	100.0	0.0	0.0	8.3	--	5	3.2	
Dayton, OH	--	--	--	25.0	25.0	50.0	0.0	--	4	2.5	
Hamilton-Middletown, OH	--	--	--	100.0	0.0	0.0	0.0	--	1	0.6	
Lima, OH	--	--	--	75.0	20.0	5.0	9.7	--	20	12.6	
Mansfield, OH	--	--	--	0.0	0.0	0.0	0.0	--	0	0.0	
Non-Metro Ohio	--	--	--	77.4	17.7	9.7	4.7	--	62	39.0	
Parkersburg, OH	--	--	--	100.0	0.0	0.0	28.6	--	2	1.3	
Youngstown, OH	--	--	--	60.0	40.0	0.0	22.7	--	10	6.3	

* The market consists of all other Small Farm reporters in Bank One 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 - Cincinnati MMA

QUALIFIED INVESTMENTS								Evaluation	
Period: 01/01/1998 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									
Cincinnati, OH	29	1,850	50	1,375	79	3,225	100.0	0	0

Table 12b Qualified Investments - State of Ohio

QUALIFIED INVESTMENTS								Evaluation	
Period: 01/01/1998 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									
Columbus, OH	48	6,331	81	6,597	129	12,928	31.6	0	0
Limited Scope									
Akron, OH	25	1,187	20	1,961	45	3,147	7.7	0	0
Canton-Massillon, OH	20	1,140	16	99	36	1,239	3.0	0	0
Cleveland, OH	55	5,505	61	890	116	6,395	15.6	0	0
Dayton, OH	32	2,609	46	889	78	3,499	8.5	0	0
Hamilton-Middletown, OH	17	26	6	15	23	41	0.1	0	0
Lima, OH	19	500	16	126	35	626	1.5	0	0
Mansfield, OH	17	28	15	444	32	472	1.2	0	0
Non-Metro Ohio	30	3,397	32	1,259	62	4,657	11.4	0	0
Parkersburg, OH	17	024	12	30	29	53	0.1	0	0
Youngstown, OH	30	7,579	32	334	62	7,913	19.3	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 - Cincinnati MMA

DISTRIBUTION OF BRANCH DELIVERY SYSTEM 01/01/1998 TO 3/31/2000														Evaluation Period:			
MSA/Assessment Area	Deposits	Branches						Branch Openings/Closings				Population					
	% of Rating Area Deposits in AA	# of Bank Branches	% of Rating Area Branches in AA	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																	
Cincinnati, OH	100.0	26	100.0	3.8	7.7	53.8	34.6	11	3	0	-1	-5	-2	8.0	15.3	47.2	29.4

Table 13b Distribution of Branch Delivery System - State of Ohio

DISTRIBUTION OF BRANCH DELIVERY SYSTEM 01/01/1998 TO 12/31/1999														Evaluation Period:			
MSA/Assessment Area	Deposits	Branches						Branch Openings/Closings				Population					
	% of Total Bank 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																	
Columbus, OH	50.2	55	19.3	9.1	16.4	47.3	25.5	1	2	0	0	0	1	9.2	20.3	42.5	28.0
Limited Scope																	
Akron, OH	6.2	22	7.7	9.1	4.5	63.6	22.7	4	0	-1	0	-1	-2	5.7	16.8	56.7	20.8
Canton-Massillon, OH	3.7	14	4.9	7.1	7.1	64.3	21.4	8	1	-1	-2	-2	-2	3.9	15.9	57.9	22.3
Cleveland, OH	10.1	47	16.5	6.4	6.4	51.1	34.0	11	1	-1	-1	-5	-3	10.3	14.2	47.3	28.2
Dayton, OH	10.6	32	11.2	15.6	6.3	50.0	28.1	3	0	-1	0	-1	-1	6.8	19.4	45.7	28.1
Hamilton-Middletown, OH	1.2	7	2.5	0.0	42.9	28.6	28.6	0	0	0	0	0	0	8.4	16.1	43.9	30.8
Lima, OH	2.2	11	3.9	9.1	0.0	90.9	0.0	3	0	-1	0	-1	-1	5.0	12.0	69.8	13.2

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

Mansfield, OH	1.2	4	1.4	25.0	0.0	50.0	25.0	0	0	0	0	0	0	3.5	20.9	46.1	29.5
Non-Metro Ohio	8.2	35	12.4	2.9	14.3	54.3	28.6	3	1	0	-1	-1	0	2.4	16.8	62.9	17.9
Parkersburg, OH	1.0	5	1.8	0.0	20.0	40.0	40.0	0	0	0	0	0	0	0.0	18.2	72.6	9.2
Youngstown, OH	5.4	26	9.1	11.5	23.1	38.5	26.9	3	1	-1	0	-1	0	5.7	14.6	53.9	25.9

