



LARGE BANK

Comptroller of the Currency
Administrator of National Banks

Washington, DC 20219

Public Disclosure

March 13, 2000

Community Reinvestment Act Performance Evaluation

Wells Fargo Bank Montana, National Association
Charter Number: 15564

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NOTE: This evaluation is not, and should not be construed as, an assessment of the financial condition of this institution. The rating assigned to this institution does not represent an analysis, conclusion, or opinion of the federal financial supervisory agency concerning the safety and soundness of this financial institution.

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General Information

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

*This document is an evaluation of the CRA performance of **Wells Fargo Bank Montana, National Association**, prepared by the **Office of the Comptroller of the Currency (OCC)**, the institution's supervisory agency, as of **March 13, 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 Business Loans - 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 Farm Loans - Loans with original amounts of \$500 thousand or less that are: (1) secured by farmland; or (2) to finance agricultural production and other loans to farmers.

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

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

Overall CRA Rating

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

The following table indicates the performance level of **Wells Fargo Bank Montana, National Association**, with respect to the Lending, Investment, and Service Tests:

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

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

The major factors that support this rating include:

- A good responsiveness to the credit needs of WFMT’s assessment areas
- A good level of community development lending to help address those needs in the assessment areas.
- A good geographic distribution of home mortgage lending.
- A good overall distribution of small loans to businesses and farms among geographies and borrowers of different income levels.
- A good level of community development investments.
- A good distribution of retail services and a good level of community development services.

Description of Institution

Wells Fargo Bank Montana, National Association (WFMT), an intrastate bank, is headquartered in Billings, Montana, and conducts business through a system of 41 branch offices in nine assessment areas. WFMT was formerly known as Norwest Bank Montana, NA. Wells Fargo & Company changed the name of the bank in August 2000. In addition to Billings (Billings MSA), WFMT has branch offices in the Great Falls and Missoula MSAs and in its Northern Rural, Eastern Rural, Southern Rural, Southwestern Rural, Fallon County, and Mineral County assessment areas. These areas encompass twenty-five counties in Montana.

WFMT is a subsidiary of Wells Fargo & Company (WFC), San Francisco, California, a multi-bank holding company. WFC recently merged with Norwest Corporation, formerly headquartered in Minneapolis, Minnesota. WFC has total assets in excess of \$200 billion and conducts business through nearly 3,000 offices and over 6,000 ATMs in 21 states.

As of December 31, 1999 WFMT had total assets of approximately \$1.4 billion, and total deposits of some \$1.2 billion. Gross loans total approximately \$888 million, equating to about 63% of total assets and about 73% of total deposits. Approximately 37% of the bank's loans are to individuals for household, family, and personal use. Another 15% of the loan portfolio financed commercial and industrial businesses. Some 43% of the portfolio are secured by real estate for one to four family purposes, construction, and land development. The remainder of the portfolio consists of agricultural loans. WFMT has a total Tier I capital base of approximately \$97 million.

At the request of WFMT and in accordance with provisions of the CRA, this evaluation considers the lending activities of the banks affiliates, Wells Fargo Home Mortgage, Inc. (WFHM), Norwest Home Improvement, Inc. (NHI), and Wells Fargo Funding, Inc. (WFFI).

WFMT is a full service bank offering a typical array of retail banking services and loan products. Its business strategy is in no way limited or specialized to any narrow field of endeavor. Through the bank's affiliates, WFHM and WFFI, borrowers can obtain home purchase and refinance lending.

There are no legal, financial, or other factors impeding the bank's ability to meet the credit needs of its assessment areas.

WFMT's was rated "Outstanding" at the previous CRA performance evaluation dated October 9, 1997.

Scope of the Evaluation

Evaluation Period/Products Evaluated

This evaluation included a review of the bank's home mortgage, small business, small farm, and community development lending; community development investments; and retail and community development services. In accordance with OCC policy, home mortgage, small business, and small farm lending was evaluated for the calendar years 1997, 1998, and 1999. All other products and activities were evaluated from August 8, 1997, the date not covered by the previous CRA public evaluation and concluding March 13, 2000.

Data Integrity

In association with this review, small business and small farm data submitted by the bank in compliance with requirements of the CRA and utilized for analysis were reviewed for accuracy utilizing a selected sample. This activity revealed no significant errors in reporting. Some minor errors were detected, but these are not judged to be material to the analysis.

Selection of Areas for Full-Scope Review

WFMT has established nine assessment areas (AAs). Two (Billings MSA and Northern Rural) were selected for full-scope review. The other AAs (Great Falls MSA, Missoula MSA, Eastern Rural, Southern Rural, Southwestern Rural, Fallon County, Mineral County) received limited-scope reviews.

Northern Rural is the largest of the bank's AAs, providing 37% of its deposits. WFMT has a significant presence in this market with about 22% of all bank deposits from that area. Billings is the headquarters for WFMT and its second largest market, with about 16% of the bank's deposits. WFMT holds about 14% of all bank deposits in the Billings market.

Ratings

The bank's overall rating is based primarily on those areas that received full-scope reviews. AAs that received limited scope reviews were evaluated for consistency of performance.

Other

Community contacts with interested parties in several of WFMT were reviewed. Identified needs included construction and permanent financing for affordable housing and small business credit, including start-up and expansion loans.

Fair Lending Review

An analysis of 1998 HMDA, Small Business, and Small Farm lending data, public comments, and consumer complaint information was performed according to the OCC's risk based fair lending approach. The analysis of this data revealed no basis for the OCC to conduct a comprehensive fair lending examination in connection with the CRA evaluation this year. The latest comprehensive fair lending exam was performed in 1997.

Conclusions:

- There is no evidence of any violations of the substantive provisions of the anti-discrimination laws and regulations.
- Wells Fargo and Company has a satisfactory process in place, including training, to help ensure corporate-wide ongoing compliance with fair lending laws.

Conclusions with Respect to Performance Tests

LENDING TEST

Conclusions for Areas Receiving Full-Scope Reviews

WFMT's performance under the Lending Test is rated "High Satisfactory". Based on full-scope reviews, the bank's performance in the Billings MSA and the Northern Rural AA are good.

LENDING ACTIVITY

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

WFMT's volume of lending represents a good responsiveness in helping meet identified credit needs in both AAs. The bank's lending volumes are generally commensurate with its AA deposit share. WFMT ranks first and second in deposit market rank in the Northern Rural AA and the Billings MSA, respectively. Its main competitor is First Interstate Bank. For home mortgage lending, which comprises 77 percent of the bank's reported loans, WFMT ranks first or second in lending among reporting lenders in the full-scope areas. The bank ranks first for all home mortgage products in the Northern Rural AA. It ranks first for refinance lending in the Billings MSA and second in home purchase and home improvement lending. Particularly noteworthy is the bank's HI lending where it has a market share 38% in Northern Rural and 24% the Billings MSA versus deposit market shares of 16% and 14% respectively.

Small business and small farm lending represent 13 and 10 percent of the number of reported loans made by the bank. The bank ranks second in small business lending in the Billings MSA and third in the Northern Rural AA, with respective market shares of six and twelve percent. First Interstate Bank dominates the small business lending market in the Billings MSA with a 73 percent market share. A handful of competitors compete for the Northern Rural market with Mountainwest Financial Corp. and First Interstate Bank leading the market with a 24 and 21 percent market share. WFMT ranks first in small farm lending in both AAs, with a 63 and a 43 percent market share in the Northern Rural AA and Billings MSA, respectively. Its primary competitor is First Interstate Bank.

In analyzing WFMT's Lending Test performance, greater weight was given to its home mortgage lending, particularly home purchase, versus its small business and small farm lending. This is because of the relative significance of each in the bank's operations, combined with the identified AA credit needs.

Distribution of Loans by Income Level of the Geography

WFMT's overall geographic distribution is good. The geographic distribution of home mortgage lending by geography is good for the Billings MSA and adequate for the Northern Rural AA. In addition, the distribution of small loans to businesses and farms are excellent and good, respectively, for both AAs. We based our conclusions primarily upon the bank's lending distribution compared to area demographics. The demographic comparison was then supplemented by a market share analysis.

Home Mortgage Loans

Refer to Tables 2, 3 and 4 in Appendix C for the facts and data used to evaluate the geographic distribution of the bank's home mortgage loan originations and purchases. WFMT's geographic distribution of home purchase and home improvement loans for both AAs are good and adequate, respectively. The distribution of refinance loans are good for the Billings MSA and adequate for the Northern Rural AA.

Home Purchase Loans

WFMT's geographic distribution of home purchase loans is good in both full-scope AAs. In the Billings MSA, the percentage of home purchase loans in low-income areas is more than three-quarters the percentage of owner-occupied housing, 1.5% versus 1.9%. Its market share in low-income geographies is nearly ninety percent of its overall market share. For both the Billings MSA and the Northern Rural AA, the bank's percentage of home purchase loans in moderate-income geographies is about two-thirds the percentage of owner-occupied housing. The bank's market share in moderate-geographies significantly exceeds its overall market share in the Northern Rural AA and is slightly less than its total market share in the Billings MSA.

Home Improvement Loans

WFMT's geographic distribution of home improvement (HI) loans is adequate overall, good in the Billings MSA, and adequate in the Northern Rural AA. In the Billings MSA, the bank's percentage of HI loans in low-income areas is about two-thirds the percentage of owner-occupied housing, 1.2% versus 1.9%. The bank made 145 HI loans in the Billings MSA in 1998 but none in the low-income geographies. In the Billings MSA, the bank's percentage of HI loans in moderate-income tracts exceeds the percentage of owner-occupied housing, and its market share in moderate-income tracts exceeds its total market share. However, in the Northern Rural AA, the bank's percentage of HI loans in moderate-income geographies is about half the owner-occupied housing there, and its market share in moderate-income geographies is less than its overall market share. The bank's performance in this AA is mitigated by the limited opportunity of the area. In 1998, all reporting lenders were only able to generate 24 home improvement loans in this AA. WFMT originated seven of these loans.

Refinance Loans

WFMT's geographic distribution of refinance loans is adequate overall, good in the Billings MSA, and adequate in the Northern Rural AA. In the Billings MSA, the bank's percentage of loans in low-income areas is close to the percentage of owner-occupied housing, at about 80 percent. Its market share in low-income geographies exceeds its overall market share. The percentage of loans in moderate-income tracts is over two-thirds the percentage of owner-occupied housing. And the market share in moderate-income tracts is slightly less than its overall markets share. In the Northern Rural AA, the percentage of loans in moderate-income areas is about half the owner-occupied housing there. And, its market share in moderate-income areas is slightly less than its total markets share.

Small Loans to Businesses

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

WFMT's geographic distribution of small loans to businesses is excellent in both full-scope AAs. The bank's percentage of lending to businesses in low-income geographies in the Billings MSA exceeds the demographics (the percentage of businesses in these geographies). And the market share of lending to small businesses in low-income geographies significantly exceeds the bank's total market share. The bank's percentage of lending to businesses in moderate-income geographies in both AAs exceeds the demographics. Its market share of lending to businesses in moderate-income geographies in the Northern Rural AA is close to its overall market share while in the Billings MSA it represents some three quarters of it.

Small Loans to Farms

Refer to Table 6 in Appendix C for the facts and data used to evaluate the geographic distribution of the bank's origination of small loans to farms.

Please note that we placed more weight on the bank's origination of small loans to farms in the Northern Rural AA than the Billings MSA because of the higher number of farms in this area and the greater need for farm loans. According to 1999 Dunn and Bradstreet Demographic Data, in the Northern Rural AA there are 144 farms in moderate-income geographies and only one farm in the low-income geography. In the Billings MSA, there are only 35 farms located in LMI geographies. Due to the very limited opportunities, we are not concluding on the bank's performance in the Billings MSA.

WFMT's geographic distribution of small loans to farms is good. In the Northern Rural AA, the bank's percentage of lending to farms in moderate-income geographies is close to the area's demographics (the percentage of farms in these geographies).

Lending Gap Analysis

Maps and reports detailing WFMT lending activity over the evaluation period for home

mortgage and small loans to businesses and farms were reviewed to identify gaps in the geographic distribution of these loans. No unexplained conspicuous gaps were identified.

Inside/Outside Ratio

WFMT has a substantial amount of its loan activity within its AAs. During the evaluation period, 92% of the bank's HMDA reported loans, 89% of its small loans to businesses, and 75% of its small loans to farms were within its AAs.

Distribution of Loans by Income Level of the Borrower

WFMT's overall borrower distribution is good. The bank's distribution of home mortgage lending to borrowers of different income levels reflects good penetration in the Billings MSA and an adequate penetration in the Northern Rural AA. The bank's distribution of small business and small farm loans to borrowers of different income levels is good and excellent, respectively, for both AAs. We based our conclusions primarily upon the bank's lending to borrowers of different income levels compared to the population demographics of the area. The demographic comparison was then supplemented by a market share analysis.

Home Mortgage Loans

Refer to Tables 7, 8 and 9 in Appendix C for the facts and data used to evaluate the borrower distribution of the bank's home mortgage loan originations and purchases. WFMT's distribution of home purchase, home improvement, and refinance lending is adequate for both AAs.

Home Purchase Loans

WFMT's borrower distribution of home purchase loans is good in the Billings MSA and Northern Rural AA. In the Northern Rural AA and the Billings MSA, the bank's percentage of home purchase lending to low-income borrowers is significantly less than the demographics (percentage of low-income borrowers). The bank's market share of lending to low-income families is close to its overall market share in both AAs. In the Northern Rural AA, the bank's percentage of home purchase lending to moderate-income families slightly exceeds the demographics (percentage of moderate-income borrowers). And in the Billings MSA, the bank's percentage of home purchase lending to moderate-income families significantly exceeds demographics. In both AAs, the bank's market share of lending to moderate-income families matches or exceeds its total market share.

Home Improvement Loans

WFMT's borrower distribution of home improvement loans is adequate in the Northern Rural AA and poor in the Billings MSA. In the Northern Rural AA and the Billings MSA, the bank's percentage of home improvement lending to low-income borrowers is significantly less than the demographics (percentage of low-income borrowers). The bank's market share of lending to low-income families is less than its overall market share in both AAs. The bank's market share of lending to low-income families is about three-quarters its total market share in Northern Rural AA but only about a quarter its total market share in the Billings MSA. In the Northern Rural AA and the Billings MSA, the bank's percentage of home improvement lending to moderate-income families is less than the demographics (percentage of moderate-income borrowers). The bank's market share of home improvement lending to moderate-income borrowers exceeds its total market share in the Northern Rural AA, but is less in the Billings MSA.

Refinance Loans

WFMT's borrower distribution of refinance loans is good in the Billings MSA and adequate in the Northern Rural AA. In the Northern Rural AA and the Billings MSA, the bank's percentage of refinance lending to low-income borrowers is significantly less than the demographics (percentage of low-income borrowers). However, the bank's percentage market share of refinance lending to low-income families exceeds its overall market share in the respective markets. In the Billings MSA the bank's percentage of refinance lending to moderate-income families is near to the demographics (percentage of moderate-income borrowers). In the Northern Rural AA the percentage of refinance lending to moderate-income families is less than the demographics (percentage of moderate-income borrowers). In both AAs, the bank's market share of refinance lending to moderate-income borrowers exceeds its total market share.

Small Loans to Businesses

Refer to Table 10 in Appendix C for the facts and data used to evaluate the borrower distribution of originations/purchases of small loans to businesses.

WFMT's distribution of small loans to smaller businesses is good. In both AAs, the bank's percentage of lending to small businesses with revenues of less than \$1 million is close to demographics (the percentage of small businesses). In the Billings MSA, the bank's market share of loans to small businesses with revenues less than \$1MM exceeds its overall market share. And in the Northern Rural AA, it is about half the overall market share.

Small Loans to Farms

Refer to Table 11 in the Appendix C for the facts and data used to evaluate the borrower distribution of originations/purchases of small loans to businesses.

The distribution of small loans to farms is excellent overall, good in the Billings MSA, and excellent in the Northern Rural AA. In both AAs, the bank's percentage of lending to small farms with revenues of less than \$1 million substantially meets or exceeds the demographics (the percentage of small farms). In addition, the bank's market share of lending to smaller farms significantly exceeds its overall market share for both AAs.

Community Development Lending

WFMT's CD lending activity had a positive impact on its performance in each of its full-scope AAs. During the evaluation period, the bank provided 3 loans totaling \$460 thousand in the Billings MSA and 11 loans totaling \$4.4 million in the Northern Rural AA. Several of these loans were innovative in structure and designed to meet specific needs of LMI groups. In some cases, the bank's involvement entailed partnering with not-for-profit organizations and/or local tribal governments to facilitate funding. The funding provided by the bank's involvement helped a variety of community development needs including affordable housing, area revitalization, housing rehabilitation and health care services for LMI persons/geographies. WFMT also provided letters of credit and financing reported under HMDA and CRA that supported revitalization programs on a local Indian reservation and financed transitional housing for LMI people. While these transactions are included in the bank's community development lending, the transactions supported community development activities. These transactions are important, as opportunities to support community development in the bank's assessment areas are limited.

- In the Billings MSA, WFMT provided a term loan to a provider of social services to LMI persons. Funds from state, county, and city governments, private in-kind donations, and grants from across the community supplemented this complex transaction.
- In the Northern Rural AA, WFMT provided unsecured financing at below market pricing to help save a business. The interim financing of this business in a moderate-income area helped save needed jobs for LMI residents.
- In the Northern Rural AA, WFMT provided unsecured financing to several programs of a local tribal government while they wait for delayed funds from the Federal Government. These loans are priced at market rates. The funds are being used for education administrative expense for the tribe's college and the interim financing of toxic waste removal and water treatment for residents of the reservation.

Product Innovation and Flexibility

Product innovation and flexibility had a positive impact on the Lending Test conclusions for the Billings MSA and Northern Rural AAs.

The bank uses flexible underwriting products to address the credit needs of both LMI persons and geographies. Both the bank and WFHM provides affordable housing products. These programs had a positive influence on the bank's performance. The bank's Community Home Affordable Mortgage Program (CHAMP), previously known as the Community Home Ownership Program, provides first mortgage assistance through a mortgage product and home ownership counseling. The first mortgage product includes flexible underwriting criteria, such as a three percent down payment and no private mortgage insurance. During the evaluation period, the bank made 389 home purchase loans, totaling about \$20.6 million under this program. WFHM made two home purchase loans under the Wells Fargo Homeownership Assistance Program. This program provides down payment assistance to people whose incomes or less than 60% of the area average income. WFHM also provided 47 loans for \$4 million under the Farmer's Home Rural Economic Community Development Services (RECDS) loan program. This program provides housing loans on rural properties to families with less than median income. In addition, WFHM made one home mortgage loan under the Housing and Urban Development 184 Indian Housing program. Under this program, HUD is authorized to provide 184 loans to Native Americans to build or purchase properties on Native American lands held in trust with the federal government.

The bank also provides a variety of Small Business Administration (SBA) loan products. The bank made 122 loans for \$12.5 million, using these products. These products did not influence the bank's performance.

Conclusions for Areas Receiving Limited-Scope Reviews

Based on limited-scope reviews, the bank's performance in the Great Falls MSA, Mineral County, Southwest Rural and the Southern Rural AA's are not inconsistent with the bank's overall performance under the Lending Test. In the Eastern Rural and Fallon County AAs the bank's performance is weaker than the bank's overall performance; however, it did not change the overall Lending Test rating.

Refer to Tables 1 through 11 in Appendix C for the facts and data that support these conclusions.

INVESTMENT TEST

Conclusions for Areas Receiving Full-Scope Reviews

The bank's performance under the Investment Test is rated "High Satisfactory". Based on full-scope reviews, the bank's performance in the Billings MSA and Northern Rural AAs is good. The community development investments of WFMT, while helping meet the critical needs of its AAs are not innovative or complex. *Refer to Table 12 in Appendix C for the facts and data used to evaluate the bank's level of qualified investments.*

In the Billings MSA, a total of \$788 thousand in qualified investments is comprised largely of securities backed by LMI mortgages in the AA and by allocated portions of LIHTCs targeted for benefit of LMI Native Americans. To assist in gauging the relative volume of investments, we calculated their relationship to Tier 1 capital, allocated by AA. The bank's community development investment activity accounts for five percent of the bank's allocated Tier 1 Capital over the evaluation period. These securities were purchased by WFMT's affiliate Wells Fargo Bank Minnesota. The portion of securities that were supported by LMI-mortgages in Montana was allocated to WFMT for CRA consideration. The allocated portion was not considered in any other affiliate's CRA performance. In addition, 20 contributions and grants total nearly \$70 thousand. These contributions are to various organizations, with a great portion being made through the United Way to organizations focused upon the needs of LMI individuals. Most of the contributions support the provision of human services, although there is some support for affordable housing and business development, as well.

In Northern Rural, the largest of the banks AAs, WFMT has made 54 investments totaling almost \$1.8 million. The bank's community development investment activity accounts for almost five percent of the bank's allocated Tier 1 Capital over the evaluation period. Major portions consist of LMI-mortgage-backed securities and LIHTCs, as in Billings. Other contributions and grants are largely targeted to support qualified community services and affordable housing for LMI persons. A number of the investments are to Native American organizations or are specifically designated for LMI persons or neighborhoods among that significant portion of the population in this AA. In one of these investments Wells Fargo and Company played a leading role in establishing credibility for a national fund created to support tax credits in Indian country. Tax credits from this fund supported the development of 20 units of affordable housing for the Northern Cheyenne Tribe.

Conclusions for Area Receiving Limited-Scope Reviews

Based on limited-scope reviews, the bank's performance under the Investment Test in all of the other AAs is not inconsistent with the bank's overall "Low Satisfactory" performance under the Investment Test.

SERVICE TEST

Conclusions for Areas Receiving Full-Scope Reviews

WFMT's performance under the Service Test is rated High Satisfactory. Based on full-scope reviews the bank's performance in the Northern Rural and Billings MSA AAs is good.

Retail Banking Services

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

WFMT's delivery systems through its branch and ATM network are accessible to essentially all portions of its AAs. In general, the distribution of the bank's branches in LMI areas approximates the percentage of the population living in those areas.

WFMT's branch distribution in the Northern Rural AA is good. The percent of branches located in LMI geographies approximates the percent of the population living in those geographies. Although the bank does not have a branch in a low-income geography, only a small percentage of the population resides in those geographies. WFMT also has one ATM in a moderate-income geography. As a result, the distribution the bank's ATMs is consistent with the branch distributions. This AA contains the largest percent of the bank's deposits.

In the Billings MSA, the bank's branch distribution is good. WFMT has an excellent distribution of branches in low-income geographies, as the percentage of the bank's branches significantly exceeds the percent of the population living within the low-income geographies. There are not, however, any branches located within the moderate-income geographies despite having some 14% of the population being located in those geographies. However, WFMT does have one ATM located in a low-income geography and two in moderate-income geographies. This results in the percent of ATMs in these geographies greatly exceeding the percent of the population residing in those areas.

Branch activity during the evaluation period did not materially impact the accessibility of the bank's services to the AAs. In the Billings AA, WFMT opened three and closed one branch. The closed branch was located in a low-income geography, while all branch openings were in middle-income geographies. We did not consider the branch closing to have a material impact on accessibility to the low-income geographies as the percentage of branches located in those geographies still significantly exceeds the percentage of population residing in low-income geographies. In addition, WFMT has one branch that borders LMI areas and two within two miles. WFMT did not have any branch opening or closing activity in the Northern Rural AA.

The bank's business hours are reasonable and are generally structured to accommodate customer needs. There were no major inconsistencies between branches in this regard.

WFMT offers a wide array of products and services through many of its branch locations. WFMT provides or administers products directed toward LMI individuals that include, but are not limited to, an affordable home loan product, a savings account that features matching federal funds, and direct-deposit accounts for the homeless that feature innovative/flexible services. Its alternative delivery systems include, but are not limited to, telephone banking, bank by mail and on-line banking that are available to all. Although these alternative delivery systems are of potential benefit to persons across all income levels, there is no information available to demonstrate the actual benefits gained by any group of persons, and these services have been considered accordingly in this evaluation.

Community Development Services

WFMT provides a good level of community development services to its community. The bank's involvement was extensive during the evaluation period with well over 200 community development services provided to groups and organizations located throughout the bank's AAs. The following highlights a few of the community development services targeted to LMI persons that are provided by the bank.

- **Tribal Code Development Task Force** - WFMT participated on this multi-bank task force to develop a uniform commercial code for use on reservations in Montana, several of which are in the bank's AAs.
- **Federal Home Loan Bank Affordable Housing Programs** - As a member, WFMT participates in affordable housing programs which provides subsidies to non-profit organizations to support affordable housing to LMI persons. The bank processes loan applications, monitors its progress and handles funding efforts for the program. During the evaluation period, WFMT assisted in securing eight FHLB grants totaling \$298,000.
- **Wells Fargo Adult Credit Education Program** - Wells Fargo uses this program to teach the basics of budgeting, banking, and lending to its communities. In addition, MWMT customized this training for use in Reservations in Montana.
- **Native American Development Corporation** - an officer of the bank serves on the Revolving Loan Fund Committee of this corporation. The corporation provides gap financing to businesses located on or near Indian reservations in Montana.
- **Neighborhood Housing Services** - an officer of the bank serves on the Board of Directors of this organization that is focused on home ownership. During 1999, down payment assistance offered through this organization helped 339 families across Montana attain home ownership. NHS also provides homebuyer education and counseling.

Conclusions for Areas Receiving Limited-Scope Reviews

Based on limited-scope reviews, the bank's performance under the Service Test in the Great Falls MSA, Missoula MSA, Eastern Rural MT, Southern Rural MT, Southwestern

Rural MT, Fallon County, and Mineral County AAs is not inconsistent with the bank's overall High Satisfactory performance under the Service Test. We noted a stronger distribution of branches in the Missoula MSA, and Southwestern Rural MT AAs, as compared to that noted in the full-scope AAs, and weaker distribution in the Eastern Rural MT, Southern Rural MT, and Mineral County AAs. Refer to Table 13 of Appendix C for the facts and data that support these conclusions.

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: January 1, 1997 to December 31, 1999 CD Lending: August 8, 1997 to March 13, 2000 Investment Test: August 8, 1997 to March 13, 2000 Service Test: August 8, 1997 to March 13, 2000	
Financial Institution		Products Reviewed
Wells Fargo Bank Montana, National Association (WFMT) Billings, MT		Small Business Lending; Small Farm Lending; Community Development (CD) Lending, Investments, Services
Affiliate(s)	Affiliate Relationship	Products Reviewed
Wells Fargo Home Mortgage Corporation Wells Fargo Funding, Inc. Norwest Home Improvement, Inc.	Holding Company Subsidiary Holding Company Subsidiary Holding Company Subsidiary	Home purchase and refinance mortgage loans Home purchase and refinance mortgage loans Home improvement loans
List of Assessment Areas and Type of Examination		
Assessment Area	Type of Exam	Other Information
Billings MSA # 0880 Great Falls MSA # 3040 Missoula MSA # 5140 Eastern Rural Fallon County Mineral County Northern Rural Southern Rural Southwest Rural	Full-Scope Limited-Scope Limited-Scope Limited-Scope Limited-Scope Limited-Scope Full-Scope Limited-Scope Limited-Scope	

Appendix B: Market Profiles for Full-Scope Areas

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Market Profiles for Areas Receiving Full-Scope Reviews

Billings MSA # 0880	B-2
Northern Rural	B-3

Billings MSA # 0880

Demographic Information for Full-Scope Area: (Billings MSA)						
Demographic Characteristics	#	Low % of #	Moderate % of #	Middle % of #	Upper % of #	NA* % of #
Geographies (Census Tracts/BNAs)	27	7	15	56	22	0
Population by Geography	113,419	4	14	64	18	0
Owner-Occupied Housing by Geography	29,371	2	12	67	20	0
Businesses by Geography	6,596	17	15	57	11	0
Farms by Geography	400	2	6	84	8	0
Family Distribution by Income Level	31,007	19	18	25	38	0
Distribution of Low- and Moderate-Income Families throughout AA Geographies	11,445	5	19	67	9	0
Median Family Income HUD Adjusted Median Family Income for 1998 Households Below the Poverty Level	= \$31,533 = \$45,100 = 12.58%	Median Housing Value Unemployment Rate				= \$62,709 = 3.62%

(*) The NA category consists of geographies that have not been assigned an income classification.
Source: 1990 U.S. Census and 1999 HUD updated MFI.

The Billings MSA assessment area encompasses the entire MSA (Yellowstone County). WFMT gains approximately 16% of its deposits from this AA and made about 16% of its loans here during the evaluation period. This AA complies with regulatory guidelines and does not arbitrarily exclude any LMI areas. WFMT is the second largest bank in Yellowstone County with approximately 14% of the total deposits. The largest bank, First Interstate Bank, is dominant in the market with about 32% of the county's commercial deposits. WFMT operates five offices in the AA.

Billings and Yellowstone County are Montana's largest (containing about 14% of the state's people), but with a population of only slightly more than 100 thousand, the MSA is not a large one. Population has increased slowly, but steadily, in recent years. The area's unemployment rate is slightly lower than that for the state as a whole. The per capita income is somewhat lower than the US average.

A review of various contacts made in the community recently reveal the typical needs for credit for affordable housing and small businesses. However, opportunities for community development are limited.

Northern Rural

Demographic Information for Full-Scope Area: Northern Rural						
Demographic Characteristics	#	Low % of #	Moderate % of #	Middle % of #	Upper % of #	NA* % of #
Geographies (Census Tracts/BNAs)	64	2	14	61	22	1
Population by Geography	177,015	<1	9	62	29	0
Owner-Occupied Housing by Geography	46,356	0	8	63	29	0
Businesses by Geography	10,193	<1	6	72	22	0
Farms by Geography	1,717	<1	8	78	14	0
Family Distribution by Income Level	47,441	18	16	23	43	0
Distribution of Low- and Moderate-Income Families throughout AA Geographies	16,366	<1	15	66	19	0
Median Family Income HUD Adjusted Median Family Income for 1998 Households Below the Poverty Level	= \$26,977 = \$36,300 = 9.27%	Median Housing Value Unemployment Rate				= \$54,029 = 6.68%

(*) The NA category consists of geographies that have not been assigned an income classification.
Source: 1990 U.S. Census and 1999 HUD updated MFI.

The Northern Rural Assessment Area encompasses eleven counties (Blaine, Chouteau, Fergus, Flathead, Hill, Lewis & Clark, Liberty, Musselshell, Pondera, Rosebud, and Toole) in the central portion of northern Montana. WFMT gains about 37% of its deposits from this area and has made approximately 28% of its loans here during the evaluation period. This AA complies with regulatory guidelines and does not arbitrarily exclude any LMI areas. WFMT is the largest bank in this AA with approximately 22% of the total deposits. Its nearest competitor, First Interstate Bank, holds about 8% of the area's deposits. WFMT operates 14 offices in the AA.

The Northern Rural area is typical of non-urban Montana. The economy is dependent upon farming, ranching, and mining. Montana's per capita income is ranked 48th among the states, and it has a high poverty rate. Many Montanans are employed in service jobs while retail and government employment are also important. The state capital, Helena, is located in this AA.

A review of recent community contacts made in Montana reveals the typical needs for affordable housing and small business financing. Opportunities for community development are limited as nonprofits and tribal governments are over a broad geographic area.

Appendix C: Tables of Performance Data

Content of Standardized Tables

References to the “bank” include activities of any affiliates that the bank provided for consideration (refer to Appendix A: Scope of the Examination). For purposes of reviewing the Lending Test tables, the following are applicable: purchased loans are treated as originations/purchases; market rank is based on the number of loans originated and purchased by the bank as compared to all other lenders in the MSA/assessment area; and market share is the number of loans originated and purchased by the bank as a percentage of the aggregate number of reportable loans originated and purchased by all lenders in the MSA/assessment area. The following is a listing and brief description of the tables:

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

- Table 7. Borrower Distribution of Home Purchase Loans** - Compares the percentage distribution of the number of loans originated and purchased by the bank to low-, moderate-, middle- and upper-income borrowers to the percentage distribution of families by income level in each MSA/assessment area. The table also presents market rank and market share information based on the most recent aggregate market data available.
- Table 8. Borrower Distribution of Home Improvement Loans** - See Table 7.
- Table 9. Borrower Distribution of Refinance Loans** - See Table 7.
- Table 10. Borrower Distribution of Small Loans to Businesses** - Compares the percentage distribution of the number of small loans (less than or equal to \$1 million) originated and purchased by the bank to businesses with revenues of \$1 million or less to the percentage distribution of businesses with revenues of \$1 million or less. The table also compares the banks percentage distribution with the percentage of loans originated and purchased by all other small business reporters in the bank's AA to businesses with revenues of \$1 million or less and is based on the most recent aggregate market data available. 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. The table also compares the banks percentage distribution with the percentage of loans originated and purchased by all other small farm reporters in the bank's AA to farms with revenues of \$1 million or less and is based on the most recent aggregate market data available. 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 have been reported on schedule RC-L of the Call Reports as an off-balance sheet item.

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

Table 1. Lending Volume

LENDING VOLUME		Evaluation Period: 01/01/1997 TO 12/31/1999										
MSA/Assessment Area	% of Rating Area Deposits in AA*	Home Mortgage		Small Business		Small Farm		Community Development		Total Reported Loans		% of Rating Area Loans in AA (% of #)
		#	\$ (000's)	#	\$ (000's)	#	\$ (000's)	#	\$ (000's)	#	\$ (000's)	
Full Scope												
Billings MSA	16.1	2,830	196,026	734	86,565	238	17,630	3	460	3,805	300,681	16
Northern Rural	37.0	4,246	250,029	888	74,794	1,404	81,467	11	4,446	6,549	410,736	28
Limited Scope												
Eastern Rural	5.6	437	16,692	108	7,278	237	12,733	1	15	783	36,718	3
Fallon County	1.2	75	2,538	19	526	26	1,043	0	0	120	4,107	<1
Great Falls MSA	13.4	4,046	205,517	439	51,857	171	19,777	0	0	4,656	277,151	20
Mineral County	.9	175	8,294	24	1,006	4	428	2	160	205	9,888	<1
Missoula MSA	4.7	1,622	135,466	226	19,790	8	116	8	659	1,864	156,031	8
Southern Rural	7.2	2,281	197,878	499	25,802	99	4,692	9	6,000	2,888	234,372	12
Southwest Rural	13.9	2,309	115,068	243	13,127	97	5,544	1	85	2,650	133,824	11

* Deposit Data as of June 30, 1999

Table 2. Geographic Distribution of Home Purchase Loans

Geographic Distribution: HOME PURCHASE																
Evaluation Period: 01/01/1997 TO 12/31/1999																
MSA/Assessment Area	Low Income Geographies		Moderate Income Geographies		Middle Income Geographies		Upper Income Geographies		Overall Market Rank*	Market Share by Geography*					Total Home Purchase Loans	
	% Owner Occ Units	% Bank Loans	% Owner Occ Units	% Bank Loans	% Owner Occ Units	% Bank Loans	% Owner Occ Units	% Bank Loans		Overall	Low	Mod	Mid	Upp	#	% of Total**
Full Scope																
Billings MSA	2	2	12	8	67	64	20	27	2	10.8	9.5	9.9	9.5	15.3	1,053	18
Northern Rural	0	0	8	5	63	60	29	35	1	14.7	0.0	21.9	13.7	15.8	1,154	20
Limited Scope																
Eastern Rural	0	0	13	3	83	91	4	6	1	26.5	0.0	10.0	26.5	60.0	122	2
Fallon County	0	0	0	0	100	100	0	0	1	63.2	0.0	0.0	63.2	0.0	26	0
Great Falls MSA	0	0	14	13	71	68	16	20	1	26.4	0.0	24.5	25.8	29.3	1,256	21
Mineral County	0	0	29	32	71	68	0	0	1	16.7	0.0	23.1	14.3	0.0	25	0
Missoula MSA	0	0	21	19	55	48	25	33	3	9.2	0.0	8.9	9.2	10.5	524	9
Southern Rural	0	0	13	6	66	67	21	27	1	18.7	0.0	15.0	18.1	21.2	888	15
Southwest Rural	0	0	9	7	63	59	28	34	1	53.0	0.0	47.4	51.8	56.4	817	14

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

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

Table 3. Geographic Distribution of Home Improvement Loans

Geographic Distribution: HOME IMPROVEMENT																
Evaluation Period: 01/01/1997 TO 12/31/1999																
MSA/Assessment Area	Low Income Geographies		Moderate Income Geographies		Middle Income Geographies		Upper Income Geographies		Overall Market Rank*	Market Share by Geography					Total Home Improvement Loans	
	% Owner Occ Units	% Bank Loans	% Owner Occ Units	% Bank Loans	% Owner Occ Units	% Bank Loans	% Owner Occ Units	% Bank Loans		Overall	Low	Mod	Mid	Upp	#	% of Total**
Full Scope																
Billings MSA	2	1	12	14	67	58	20	26	2	23.6	0.0	25.8	21.5	30.4	322	10
Northern Rural	0	0	8	4	63	67	29	29	1	37.7	0.0	30.4	36.3	43.0	605	18
Limited Scope																
Eastern Rural	0	0	13	4	83	91	4	5	1	61.0	0.0	0.0	59.5	100.0	75	2
Fallon County	0	0	0	0	100	100	0	0	1	57.1	0.0	0.0	57.1	0.0	18	1
Great Falls MSA	0	0	14	14	71	65	16	21	1	64.6	50.0	63.6	64.1	67.1	1,567	47
Mineral County	0	0	29	25	71	75	0	0	2	25.0	0.0	0.0	33.3	0.0	8	0
Missoula MSA	0	0	21	18	55	59	25	23	1	37.7	0.0	30.4	36.3	43.0	152	5
Southern Rural	0	0	13	11	66	68	21	21	1	37.0	0.0	35.5	35.7	41.2	284	9
Southwest Rural	0	0	9	10	63	66	28	23	1	40.4	0.0	23.5	43.1	38.1	289	9

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

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

Table 4. Geographic Distribution of Home Mortgage Refinance Loans

Geographic Distribution: HOME MORTGAGE REFINANCE										Evaluation Period: 01/01/1997 TO 12/31/1999						
MSA/Assessment Area	Low Income Geographies		Moderate Income Geographies		Middle Income Geographies		Upper Income Geographies		Overall Market Rank*	Market Share by Geography					Total Home Mortgage Refinance Loans	
	% Owner Occ Units	% Bank Loans	% Owner Occ Units	% Bank Loans	% Owner Occ Units	% Bank Loans	% Owner Occ Units	% Bank Loans		Overall	Low	Mod	Mid	Upp	#	% of Total**
Full Scope																
Billings MSA	2	2	12	8	67	65	20	25	1	16.8	18.8	15.8	16.3	18.6	1,451	16
Northern Rural	0	0	8	4	63	64	29	32	1	23.6	0.0	21.6	23.8	23.4	2,484	28
Limited Scope																
Eastern Rural	0	0	13	8	83	89	4	4	1	48.2	0.0	56.3	47.2	57.1	240	3
Fallon County	0	0	0	0	100	100	0	0	1	32.4	0.0	0.0	32.4	0.0	31	0
Great Falls MSA	<1	<1	14	9	71	68	16	24	1	23.7	50.0	15.7	23.1	30.1	1,219	14
Mineral County	0	0	29	19	71	81	0	0	1	60.4	0.0	56.5	61.5	0.0	141	2
Missoula MSA	0	0	21	16	55	54	25	29	1	14.5	0.0	10.1	17.7	13.4	945	11
Southern Rural	0	0	13	7	66	68	21	25	1	23.3	0.0	20.4	23.6	23.4	1,107	13
Southwest Rural	0	0	9	5	63	67	28	28	1	46.8	0.0	44.9	48.3	43.9	1,203	14

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

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

Table 5. Geographic Distribution of Small Loans to Businesses

Geographic Distribution: SMALL BUSINESS																	Evaluation Period: 01/01/1997 TO 12/31/1999																
MSA/Assessment Area	Low Income Geographies		Moderate Income Geographies		Middle Income Geographies		Upper Income Geographies		Overall Market Rank*	Market Share by Geography*					Total Small Business Loans																		
	% of Businesses	% Bank Loans	% of Businesses	% Bank Loans	% of Businesses	% Bank Loans	% of Businesses	% Bank Loans		Overall	Low	Mod	Mid	Upp	#	% of Total**																	
Full Scope																																	
Billings MSA	17	18	15	16	57	54	11	12	2	6.3	17.8	4.9	4.9	9.1	734	23																	
Northern Rural	0	0	6	7	72	72	23	21	3	11.8	0.0	11.6	10.3	19.6	888	28																	
Limited Scope																																	
Eastern Rural	0	0	8	1	91	98	2	1	1	40.7	0.0	0.0	43.9	0.0	108	3																	
Fallon County	0	0	0	0	100	100	0	0	1	28.6	0.0	0.0	30.0	0.0	19	1																	
Great Falls MSA	14	12	26	28	53	50	7	10	1	21.5	24.4	22.7	21.7	21.5	439	14																	
Mineral County	0	0	29	25	71	75	0	0	2	22.6	0.0	25.0	22.2	0.0	24	1																	
Missoula MSA	0	0	41	40	43	42	15	19	5	6.0	0.0	3.8	8.6	5.8	226	7																	
Southern Rural	0	0	16	11	67	66	17	23	4	5.8	0.0	1.8	7.5	6.8	499	16																	
Southwest Rural	0	0	17	23	64	63	19	14	2	16.8	0.0	45.3	11.6	18.2	243	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.

Table 6. Geographic Distribution of Small Loans to Farms

Geographic Distribution: SMALL FARM																
Evaluation Period: 01/01/1997 TO 12/31/1999																
MSA/Assessment Area	Low Income Geographies		Moderate Income Geographies		Middle Income Geographies		Upper Income Geographies		Overall Market Rank*	Market Share by Geography*					Total Loans Small Farm Loans	
	% of Farms	% Bank Loans	% of Farms	% Bank Loans	% of Farms	% Bank Loans	% of Farms	% Bank Loans		Overall	Low	Mod	Mid	Upp	#	% of Total**
Full Scope																
Billings MSA	3	1	6	2	84	85	8	12	1	43.5	50.0	20.0	45.4	39.3	238	10
Northern Rural	0	0	8	7	78	88	14	5	1	63.0	0.0	48.2	69.4	51.9	1,404	61
Limited Scope																
Eastern Rural	0	0	19	18	79	82	1	0	1	91.0	0.0	95.2	89.2	0.0	237	10
Fallon County	0	0	0	0	100	100	0	0	1	72.2	0.0	0.0	72.2	0.0	26	1
Great Falls MSA	3	4	5	1	84	82	8	13	1	68.4	100.0	50.0	69.2	75.0	171	7
Mineral County	0	0	0	0	100	100	0	0	1	100.0	0.0	0.0	100.0	0.0	4	0
Missoula MSA	0	0	25	0	59	88	16	13	2	36.36	0.0	0.0	40.0	0.0	8	0
Southern Rural	0	0	15	37	73	47	12	15	2	23.9	0.0	27.3	20.5	30.8	99	4
Southwest Rural	0	0	9	2	84	94	7	4	1	42.6	0.0	0.0	50.0	11.1	97	4

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

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

Table 7. Borrower Distribution of Home Purchase Loans

Borrower Distribution: HMDA HOME PURCHASE										Evaluation Period: 01/01/1997 TO 12/31/1999						
MSA/Assessment Area	Low Income Borrowers		Moderate Income Borrowers		Middle Income Borrowers		Upper Income Borrowers		Overall Market Rank*	Market Share by Borrower Income*					Total Home Purchase Loans	
	% of Families	% Bank Loans**	% of Families	% Bank Loans**	% of Families	% Bank Loans**	% of Families	% Bank Loans**		Overall	Low	Mod	Mid	Upp	#	% of Total
Full Scope																
Billings MSA	19	8	18	24	25	28	38	37	2	10.8	9.4	10.7	14.4	15.3	1,053	18
Northern Rural	18	5	17	18	23	27	43	48	1	14.7	13.6	16.2	18.1	20.6	1,154	20
Limited Scope																
Eastern Rural	21	5	18	18	26	30	35	46	1	26.5	10.0	34.8	27.9	40.7	122	2
Fallon County	15	8	22	19	29	35	34	35	1	63.2	0.0	50.0	80.0	71.4	26	0
Great Falls MSA	17	7	19	21	24	32	40	39	1	26.4	28.8	34.0	36.4	33.1	1,256	21
Mineral County	22	8	22	28	25	20	31	40	1	16.7	0.0	12.5	25.0	18.8	25	0
Missoula MSA	19	4	15	20	20	31	45	44	3	9.2	8.7	12.16	9.6	12.4	524	9
Southern Rural	18	2	18	12	24	27	40	57	1	18.7	15.2	17.9	23.8	22.9	888	15
Southwest Rural	20	10	17	27	22	26	41	37	1	53.0	55.8	56.1	62.9	51.5	817	14

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

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

Table 8. Borrower Distribution of Home Improvement Loans

Borrower Distribution: HOME IMPROVEMENT																
Evaluation Period: 01/01/1997 TO 12/31/1999																
MSA/Assessment Area	Low Income Borrowers		Moderate Income Borrowers		Middle Income Borrowers		Upper Income Borrowers		Overall Market Rank*	Market Share By Borrower Income*					Total Home Improvement Loans	
	% of Families	% Bank Loans**	% of Families	% Bank Loans**	% of Families	% Bank Loans**	% of Families	% Bank Loans**		Overall	Low	Mod	Mid	Upp	#	% of Total
Full Scope																
Billings MSA	19	6	18	15	25	29	38	42	2	23.6	6.3	17.9	22.6	28.9	322	10
Northern Rural	18	6	17	13	23	25	43	54	1	37.7	29.6	39.1	32.1	41.3	605	18
Limited Scope																
Eastern Rural	21	5	18	4	26	32	35	56	1	61.0	25.0	0.0	57.1	76.2	75	2
Fallon County	15	0	22	6	29	28	34	61	1	57.1	0.0	0.0	50.0	66.7	18	1
Great Falls MSA	17	9	19	18	24	26	40	46	1	64.6	83.0	69.4	62.4	62.6	1,567	47
Mineral County	22	25	22	25	25	13	31	38	2	25.0	0.0	0.0	33.3	33.3	8	0
Missoula MSA	19	2	15	14	20	29	45	55	2	19.1	5.0	15.0	18.6	22.0	152	5
Southern Rural	18	2	18	12	24	19	40	66	1	37.0	22.2	23.5	32.1	42.5	284	9
Southwest Rural	20	8	17	16	22	24	41	49	1	40.4	42.1	41.2	32.8	44.7	289	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.

Table 9. Borrower Distribution of Home Mortgage Refinance Loans

Borrower Distribution: HOME MORTGAGE REFINANCE										Evaluation Period: 01/01/1997 TO 12/31/1999							
MSA/Assessment Area	Low Income Families		Moderate Income Families		Middle Income Families		Upper Income Families		Overall Market Rank*	Market Share by Borrower Income*					Total Loans		
	% of Families	% Bank Loans**	% of Families	% Bank Loans**	% of Families	% Bank Loans**	% of Families	% Bank Loans**		Overall	Low	Mod	Mid	Upp	#	% of Total	
Full Scope																	
Billings MSA	19	6	18	16	25	24	38	37	1	16.8	17.7	17.1	16.0	20.0	1,451	16	
Northern Rural	18	4	17	11	23	23	43	52	1	23.6	39.5	29.3	26.6	27.7	2,484	28	
Limited Scope																	
Eastern Rural	21	3	18	11	26	26	35	56	1	48.2	25.0	34.8	49.1	61.2	240	3	
Fallon County	15	10	22	0	29	23	34	65	1	32.4	0.0	0.0	37.5	36.8	31	0	
Great Falls MSA	17	6	19	15	24	24	40	47	1	23.7	44.0	31.2	27.9	26.9	1,219	14	
Mineral County	22	6	22	21	25	23	31	48	1	60.4	87.5	64.3	46.7	65.9	141	2	
Missoula MSA	19	3	15	16	20	25	45	45	1	14.5	18.1	17.2	17.6	15.4	945	11	
Southern Rural	18	3	18	11	24	22	40	54	1	23.3	25.9	25.7	28.3	24.0	1,107	13	
Southwest Rural	20	5	17	15	22	25	41	46	1	46.8	45.5	51.3	50.5	46.7	1,203	14	

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

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

Table 10. Borrower Distribution of Small Loans to Businesses

Borrower Distribution: SMALL BUSINESS			Evaluation Period: 01/01/1997 TO 12/31/1999							
MSA/Assessment Area	Businesses With Revenues of \$1 million or less			% Distribution of Loans by Original Amount Regardless of Business Size			Market Share*		Total Small Business Loans	
	% Business**	% Bank Loans***	% Market Loans*	\$100,000 or less	>\$100,000 to \$250,000	>\$250,000 to \$500,000	All	Rev \$ 1 Million or Less	#	% of Total
Full Scope										
Billings MSA	74	63	44	80	14	6	6.3	9.3	734	23
Northern Rural	76	67	51	87	9	4	11.9	14.0	888	28
Limited Scope										
Eastern Rural	70	82	50	92	7	1	40.7	32.8	108	3
Fallon County	72	84	94	100	0	0	28.6	31.3	19	1
Great Falls MSA	74	60	56	82	13	5	21.5	22.8	439	14
Mineral County	80	79	45	95	5	0	22.6	21.4	24	1
Missoula	74	63	65	89	8	3	5.7	7.4	226	7
Southern Rural	78	70	73	91	6	3	5.8	8.5	499	16
Southwest Rural	75	62	92	91	6	3	16.8	14.1	243	8

* The market consists of all other Small Business reporters in WFMT'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. No revenue information was available for 8.9% of small loans to businesses reported by WFMT.

Table 11. Borrower Distribution of Small Loans to Farms

Borrower Distribution: SMALL FARM			Evaluation Period: 01/01/1997 TO 12/31/1999							
MSA/Assessment Area	Businesses With Revenues of \$ 1million or less		% Distribution Loans by Original Amount Regardless of Farm Size			Market Share*		Total Small Farm Loans		
	% Farms**	% Bank Loans***	% Market Loans*	\$100,000 or less	>\$100,000 to \$250,000	>\$250,000 to \$500,000	All	Rev \$ 1 Million or Less	#	% of Total
Full Scope										
Billings MSA	96	94	83	82	13	5	43.5	47.2	238	11
Northern Rural	96	98	88	85	12	3	63.0	65.0	1,404	62
Limited Scope										
Eastern Rural	97	98	100	90	8	2	91.0	91.8	237	10
Fallon County	99	100	91	92	4	4	72.2	72.2	26	1
Great Falls MSA	96	87	90	63	30	7	68.4	68.1	171	8
Mineral County	100	100	90	50	50	0	100.0	100.0	4	0
Missoula	95	100	83	100	0	0	36.4	36.4	8	0
Southern Rural	95	98	100	91	8	1	23.9	25.9	99	4
Southwest Rural	92	85	0	84	11	5	42.6	44.2	97	4

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

** As a Percentage of Farms with known revenues.

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

Table 12. Qualified Investments

QUALIFIED INVESTMENTS		Evaluation Period: 08/08/97 to 03/13/00							
MSA/Assessment Areas:	Prior Period Investments*		Current Period Investments		Total Investments			Unfunded Commitments**	
	#	\$ (000's)	#	\$ (000's)	#	\$ (000's)	% of Total \$'s	#	\$ (000's)
Full-Scope:									
Billings MSA	0	0	20	546	22	788	16.58	1	242
Northern Rural	0	0	52	1,206	54	1,761	37.05	1	555
Limited-Scope:									
Eastern Rural	0	0	2	170	4	254	5.34	1	84
Fallon County	0	0	1	36	2	54	1.14	1	18
Great Falls MSA	0	0	10	442	12	643	13.53	1	201
Mineral County	0	0	1	28	3	42	0.88	1	14
Missoula MSA	0	0	8	150	10	220	4.63	1	70
Southern Rural	0	0	13	231	15	339	7/13	1	108
Southwest Rural	0	0	23	444	25	652	13.72	1	208

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

** "Unfunded Commitments" means legally binding investment commitments that are tacked and reported by the bank's financial reporting system.

Table 13. Distribution of Branch Delivery System

DISTRIBUTION OF BRANCH DELIVERY SYSTEM																	
Evaluation Period: 8/8/97 TO 3/13/00																	
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:																	
Billings MSA	16.1	5	12.2	20.0	0.0	80.0	0.0	1	3	-1	0	+3	0	3.6	14.3	64.1	18.2
Northern Rural	37.0	14	34.2	0.0	7.1	78.6	14.3	0	0	0	0	0	0	0.3	9.3	61.9	28.6
Limited-Scope:																	
Great Falls MSA	13.4	6	14.6	16.7	0.0	66.7	16.7	1	3	0	0	+1	+1	0.8	17.3	68.9	13.0
Missoula MSA	4.7	4	9.8	0.0	75.0	25.0	0.0	1	2	0	+1	0	0	0.0	25.6	50.1	22.4
Eastern Rural	5.6	3	7.3	0.0	0.0	100.0	0.0	0	0	0	0	0	0	0.0	13.9	82.8	3.3
Southern Rural	7.2	3	7.3	0.0	0.0	100.0	0.0	0	0	0	0	0	0	0.0	18.6	62.3	19.1
Southwestern Rural	13.9	4	9.8	0.0	25.0	50.0	25.0	1	0	0	-1	0	0	0.0	10.9	62.9	26.2
Fallon County	1.2	1	2.4	0.0	0.0	100.0	0.0	0	0	0	0	0	0	0.0	0.0	100.0	0.0
Mineral County	0.9	1	2.4	0.0	0.0	100.0	0.0	0	0	0	0	0	0	0.0	29.5	70.5	0.0

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